EXHIBIT B

WOLLMUTH MAHER & DEUTSCH LLP

500 Fifth Avenue

New York, New York 10110

Telephone: (212) 382-3300

Facsimile: (212) 382-0050

William A. Maher Paul R. DeFilippo James N. Lawlor

Special Litigation Counsel for the Debtors and Debtors-in-Possession

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	X	
In re:	:	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., et al.	:	Case No. 08-13555 (JMP)
Debtors.	:	
	X	

FIRST MONTHLY FEE APPLICATION OF WOLLMUTH MAHER & DEUTSCH LLP FOR COMPENSATION OF SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS SPECIAL COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION

Name of Applicant:

Wollmuth Maher & Deutsch LLP

Authorized to Provide

Professional Services to:

Debtors and Debtors-in-Possession

Date of Retention:

Order Entered October 20, 2010 [Docket No. 11872]

Nunc Pro Tunc to September 9, 2010

Application Period:

September 9, 2010 to October 31, 2010

Amount of

Compensation Sought:

\$573,053.75

Amount of Expense

Reimbursement Sought:

\$ 18,442.19

80% of Compensation Sought

as Actual, Reasonable and

\$458,443.00

08-13555-mg	Doc 17346-2	Filed 06/02/11 (Part 1 of 2) P	Entered 06/02/11 20:51: g 3 of 62	:13 Exhibit B
Necessary:				

This is a: X Monthly ___Interim ___Final Application

This is Wollmuth Maher & Deutsch LLP's first monthly fee application in this case.

Timekeeper Summary

Timekeeper	Position	Year of Admission	Rate	Hours	Amount
Paul R. DeFilippo	Senior Partner	Area of Expertise: Litigation, Bankruptcy. Member of the New York Bar (1999), New Jersey Bar (1978).	\$615.00	73.20	\$45,018.00
		Joined the firm in 2002.			
William A. Maher	Senior Partner	Area of Expertise: Litigation. Member of the New York Bar (1986), New Jersey Bar (1998). Joined the firm in 1998.	595.00	90.90	54,085.50
Sandip Bhattacharji	Partner	Area of Expertise: Litigation. Member of the New York Bar (1991). Joined the firm in 2006.	550.00	80.10	44,055.00
Vince Chang	Partner	Area of Expertise: Litigation. Member of the New York Bar (1988). Joined the firm in 2002.	550.00	47.90	26,345.00
William F. Dahill	Partner	Area of Expertise: Litigation. Member of the New York Bar (1992). Joined the firm in 1998.	550.00	6.90	3,795.00
James N. Lawlor	Partner	Area of Expertise: Litigation, Bankruptcy. Member of the New York Bar (1993), New Jersey Bar (1992). Joined the firm in 2002.	550.00	160.50	88,275.00
Randall Rainer	Partner	Area of Expertise: Litigation. Member of the New York Bar (1995). Joined the firm in 2000.	550.00	120.10	66,055.00
Michael C. Ledley	Counsel	Area of Expertise: Litigation. Member of the New York Bar (2991). Joined the firm in 2010.	495.00	142.45	70,512.75

Adam M.	Associate	Area of Expertise:	395.00	239.80	94,721.00
Bialek		Litigation.	333.00	257.00	74,721.00
		Member of the New			
		York Bar (2002), New			
		Jersey Bar (2002).			
		Joined the firm in 2005.			
Alexis Castillo	Associate	Area of Expertise:	250.00	111.20	27,800.00
		Litigation.			27,000.00
		Member of the New			
		York Bar (2010).			
		Joined the firm in 2009.			
John D.	Associate	Area of Expertise:	350.00	116.60	40,810.00
Giampolo		Litigation, Bankruptcy.			
		Member of the New			
		York Bar (2005), New			
		Jersey Bar (2005).			
		Joined the firm in 2010.			
Christopher G.	Associate	Area of Expertise:	250.00	28.40	7,100.00
Passavia		Litigation.			
		Member of the New			
		York Bar (2010).			
		Joined the firm in 2010.			
Matthew Bost	Paralegal		110.00	9.90	1,089.00
Kyle J. Dumas	Paralegal		110.00	3.80	418.00
Martina	Paralegal		110.00	1.20	132.00
Frederick					
Evelina A.	Paralegal		110.00	3.20	352.00
Grezak					
Rebecca	Paralegal		110.00	0.50	55.00
Regan					
Agatha D.	Paralegal		110.00	0.60	66.00
Rysinski					
Katia Sperduto	Paralegal		110.00	37.10	4,452.00
			Total	1274.35	\$575,136.25

SUMMARY OF SERVICES

SERVICE	HOURS	VALUE
Claims Administration and Objections	310.30	\$150,287.50
Avoidance Action Litigation	956.55	420,683.75
Travel	7.50	4,165.00
Subtotal:	1274.35	\$575,136.25
Less ½ Travel Time	(3.75)	(\$2,082.50)
TOTAL SERVICES:	1,270.60	\$573,053.75

SUMMARY OF DISBURSEMENTS

DISBURSEMENTS	Value
1. Duplicating (@ \$0.10 per page)	\$1,420.90
2. Postage Expense	55.44
3. Facsimile (@ \$1.00 per page)	64.00
4. Legal Research (Lexis Nexis)	11,722.02
5. Transportation – Car Service	4,538.73
6. Working Dinner	582.46
7. Travel	9.50
8. Telephone Service	10.08
9. Federal Express	39.06
TOTAL DISBURSEMENTS:	\$18,442.19

WOLLMUTH MAHER & DEUTSCH LLP 500 Fifth Avenue

New York, New York 10110 Telephone: (212) 382-3300 Facsimile: (212) 382-0050

William A. Maher Paul R. DeFilippo James N. Lawlor

Special Counsel for the Debtors and Debtors In Possession

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	X	
In re:	•	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., et al.	:	Case No. 08-13555 (JMP)
Debtors.	:	
	X	

FIRST MONTHLY FEE APPLICATION OF WOLLMUTH MAHER & DEUTSCH LLP FOR COMPENSATION OF SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS SPECIAL COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION

By this application (the "Application"), pursuant to sections 330 and 331 of title 11 of the United States Code (the "Bankruptcy Code"), and Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Wollmuth Maher & Deutsch LLP ("Wollmuth" or the "Firm") hereby seeks reasonable compensation in the above-captioned cases (the "Debtors"), for professional legal services rendered as counsel to the Debtors in the amount of \$458,443.00, together with reimbursement for actual and necessary expenses incurred in the amount of \$18,442.19 for the period commencing September 9, 2010 through and including October 31, 2010 (the "Compensation Period"). Pursuant to Third Amended Order Pursuant to Sections 105(a) and 331 of the Bankruptcy Code and Bankruptcy Rule 2016(a) Establishing Procedures for Interim Monthly Compensation and Reimbursement of Expenses of

Professionals dated June 25, 2009 [Docket No. 4165] establishing procedures for interim compensation and reimbursement of professionals (the "Compensation Order"), Wollmuth seeks reimbursement of 80% of its total reasonable and necessary fees incurred, in the amount of \$458,443.00, together with 100% reimbursement for actual and necessary expenses incurred in the amount of \$18,442.19, for the Compensation Period. In support of this Application, Wollmuth represents as follows:

BACKGROUND

- 1. Commencing on September 15, 2008 and periodically thereafter (as applicable, the "Commencement Date"), LBHI and certain of its subsidiaries commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code. The Debtors' chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"). The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.
- 2. On September 17, 2008, the United States Trustee for the Southern District of New York (the "<u>U.S. Trustee</u>") appointed the statutory committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the "<u>Creditors' Committee</u>").
- 3. On September 19, 2008, a proceeding was commenced under the Securities Investor Protection Act of 1970 ("SIPA") with respect to Lehman Brothers Inc. ("LBI"). A trustee appointed under SIPA is administering LBI's estate.
- 4. On January 19, 2009, the U.S. Trustee appointed Anton R. Valukas as examiner in the above-captioned chapter 11 cases (the "Examiner") and by order, dated January 20, 2009 [Docket No. 2583] the Court approved the U.S. Trustee's appointment of the Examiner. The

Examiner issued a report of his investigation pursuant to section 1106 of the Bankruptcy Code on March 11, 2010 [Docket No. 7531].

- 5. On April 14, 2010, the Debtors filed a revised joint chapter 11 plan and disclosure statement [Docket Nos. 8330 and 8332].
- 6. On October 1, 2010, the Debtors filed an application [Docket No. 11761] to retain Wollmuth to serve as conflicts and special litigation counsel, in connection with the prosecution of certain avoidance actions brought pursuant to sections 547 and 548 of the Bankruptcy Code and other related claims, and such other litigation related matters as may be assigned by the Debtors (together, the "Representative Matters").
- 7. On October 28, 2010, this Court entered an Order that approved Wollmuth's retention as counsel to the Debtors [Docket No. 11872] (the "Retention Order") nunc pro tunc to September 9, 2010.

JURISDICTION AND VENUE

8. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). The statutory predicates for the relief requested herein are sections 330 and 331 of the Bankruptcy Code.

RELIEF REQUESTED

9. Wollmuth submits this Application in accordance with the Compensation Order. All services for which Wollmuth requests compensation were performed for, or on behalf of, the Debtors. In connection with the professional services rendered, by this Application, Wollmuth seeks compensation in the amount of \$458,443.00 and expense reimbursement of \$18,442.19. Attached hereto as Exhibit A is a detailed explication of hours spent rendering legal services to

the Debtors supporting Wollmuth's request of \$458,443.00 in compensation for fees incurred during the Compensation Period. Attached hereto as Exhibit B is a detailed list of disbursements made by Wollmuth supporting its request of \$18,442.19 in expense reimbursement for the Compensation Period.

- 10. Given the nature and value of the services that Wollmuth provided to the Debtors as described herein, the amounts sought under this Application are fair and reasonable under section 330 of the Bankruptcy Code given the complexity of this case; the time expended by attorneys and professionals; the nature and extent of the services rendered; the value of such services; and the costs of comparable services other than in a case under the Bankruptcy Code.
- 11. Wollmuth has received no payment and no promises for payment from any source for services rendered in connection with this case other than those in accordance with the Bankruptcy Rules. There is no agreement or understanding between Wollmuth and any other person (other than members of Wollmuth) for the sharing of compensation to be received for the services rendered in this case.

SUMMARY OF SERVICES RENDERED

- 12. In rendering services to the Debtors during its chapter 11 case, the Firm's legal team has been composed primarily of professionals with extensive experience in bankruptcy and in the applicable legal practice areas for the matters for which the Firm was retained. These professionals have coordinated assignments, both internally and with the Debtors' general counsel, Weil, Gotshal & Manges, LLP, and conflicts counsel, Curtis Mallet-Prevost, Colt & Mosle, LLP, to maximize efficiency and avoid any duplication of effort.
- 13. All services were rendered by Wollmuth at the request of the Debtors and were necessary, reasonable and appropriate under the circumstances and beneficial to the estate at the

08-13555-mg Doc 17346-2 Filed 06/02/11 Entered 06/02/11 20:51:13 Exhibit B (Part 1 of 2) Pg 12 of 62

time the services were rendered. The compensation sought by Wollmuth in this Application is comparable to or less than customary compensation sought by comparably skilled professionals in cases under the Bankruptcy Code. In addition, the compensation sought is based on Wollmuth's standard and usual rates for similar services in representations other than under the Bankruptcy Code.

14. The services provided by Wollmuth during the Compensation Period were rendered to ensure no unnecessary duplication and are grouped into the billing categories set forth in Exhibit A. The attorneys and professionals who rendered services relating to each category are identified in the above attachment and summaries of the hours and fees of each for the Application Period and the total compensation by billing category are included in Exhibit A. Because detailed invoices of the services rendered by Wollmuth are attached as Exhibit A, the following descriptions will describe only in summary form the services performed by Wollmuth.

A. SPV Payment Priority Litigation - 001

15. The largest portion of the Firm's services during the Application Period were provided in connection the filing of an adversary proceeding (i) to prevent certain unenforceable *ipso facto* clauses from improperly modifying the right of Lehman Brothers Special Finance, Inc. ("LBSF") to priority of payment of more than \$3 billion dollars under certain transaction documents related to credit default swap agreements based solely upon the filing of LBSF and its ultimate parent, LBHI, for bankruptcy; and (ii) to recover funds that were improperly paid to noteholders. On September 9, 2010, the Firm was formally asked to serve as counsel as a result of conflicts of interest identified by Weil, Gotshal and Curis Mallet-Prevost firms.

¹ The Firm filed an adversary encaptioned <u>Lehman Bros. Spec. Fin., Inc. v. Bank of America</u>, <u>N.A.</u>, Adv. Proc. No. 10-03547 (JMP).

08-13555-mg Doc 17346-2 Filed 06/02/11 Entered 06/02/11 20:51:13 Exhibit B (Part 1 of 2) Pg 13 of 62

- 16. The Debtors advised the Firm that it was critical that the complaint in the above matter be filed no later than September 15, 2010, after which the two-year statute of limitations under 11 U.S.C. § 546 may expire for any Chapter 5 avoidance actions needing to be brought in the Chapter 11 proceedings. Accordingly, the Firm committed a substantial portion of its resources into evaluating the potential claims held by the Debtors, ascertaining the factual underpinnings of the claims, determining who the various defendants were likely to be and the like—all on an expedited basis. The Firm also worked closely with the Debtors' management team and counsel to insure that the estates' legal positions remained consistent at all times with concurrent litigation that was already filed or about to be filed in these cases.
- 17. By necessity, the initial services required the Firm's personnel to work nearly around the clock for five (5) days to make sure that the complaint would be ready to be timely filed. As a result of the Firm's services, the complaint was filed on September 14, 2010.
- 18. In addition to the filing of the complaints, the Firm was also asked to simultaneously prepare and file a motion to expedite discovery needed to identify and serve an unknown number of the beneficial holders of notes in some 43 structured finance transactions. The Court subsequently granted the relief sought in the motion.

B. Derivative Close Out Claims - 002

19. Shortly after the Firm began preparing the adversary complaint discussed above, as a result of yet another conflict, the Firm was asked to render services related to disputed unsecured claims of approximately \$2.5 billion filed by three (3) Goldman Sachs entities. The unsecured claims arose from the termination and close out of approximately 57,000 derivative transactions under certain ISDA Master Agreements. The Firm was asked to support the Debtors' efforts to resolve the claims in a structured, but informal process. The services

included not only an evaluation of the legal and factual underpinnings of the Debtors' and claimants' cases, but also involved several meetings with key management and representatie of the claimants.

C. Koch Avoidance Litigation - 003

20. The Firm was asked to assist in the potential filing of an avoidance action involving certain Koch entities. While the Debtors had previously reached an agreement with the Koch entities to toll the statute of limitations, the Firm was advised that the agreement may be terminated shortly. Accordingly the Firm undertook to prepare on an expedited basis should litigation have to be filed to preserve the estates' rights.

COMPENSATION REQUESTED

- 21. For the Compensation Period, Wollmuth seeks compensation in the amount of \$458,443.00 (80% of the total fees of \$573,053.75 incurred during the Application Period) in connection with the professional services summarized above and detailed in Exhibit A, and total costs and expenses in the amount of \$18,442.19 as detailed in Exhibit B.
- 22. It is Wollmuth's policy to charge its clients in all areas of practice the amounts incurred by Wollmuth for identifiable, non-overhead expenses incurred in connection with the client's case that would not have been incurred except for representation of that particular client. Examples of such expenses are postage, overnight mail, courier delivery, computer assisted legal research, photocopying, outgoing facsimile transmissions, transportation and long-distance telephone.
- 23. Wollmuth represents as follows with regard to its charges for actual and necessary costs and expenses during the Compensation Period:
 - (a) Long-distance telephone charges are billed at actual costs:
 - (b) Photocopy charges are \$.10 per page;

- (c) Incoming facsimiles are not billed. Outgoing facsimiles are billed at the rate of \$1.00 per page; and,
- (d) Outside information services, including computer assisted legal research and PACER, are billed at actual costs.
- (e) car services are capped at \$100.00 per hour and only permitted for travel after 8:00 p.m.
- (f) meals charges are billed at actual cost but are capped at \$20 per person and are only charged for meals after normal business hours or on weekends
- 24. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amounts requested for compensation and expense reimbursement are fair and reasonable given: (a) the complexity of these cases; (b) the time expended; (c) the nature and extent of the services rendered; (d) the value of such services; and (e) the cost of comparable services other than in a case under the Bankruptcy Code.
- 25. The undersigned has reviewed the requirements of Local Rule 2016-2, and certifies that this Application and the Exhibits attached hereto comply therewith and a copy of this Application has been sent to the parties set forth in the Compensation Order.

[Remainder of page intentionally left blank]

08-13555-mg Doc 17346-2 Filed 06/02/11 Entered 06/02/11 20:51:13 Exhibit B (Part 1 of 2) Pg 16 of 62

WHEREFORE, the Firm asks the Court to approve for the current Compensation Period the sum of \$10, the total compensation for professional services rendered, 80% or \$458,443.00 of which is to be currently paid upon the filing of a certificate of no objection, and the sum of \$18,442.19 for reimbursement of actual and necessary costs and expenses incurred by it in these cases from September 9, 2010 through October 31, 2010.

Respectfully submitted,

By: /s/ James N. Lawlor

William A. Maher
Paul R DeFilippo
James N. Lawlor
WOLLMUTH MAHER & DEUTSCH LLP
500 Fifth Avenue
New York, New York 10110
Telephone (212) 282 2200

Telephone: (212) 382-3300 Facsimile: (212) 382-0050

Special Counsel for the Debtors and Debtors-in-Possession

Dated: New York, New York November 19, 2010 08-13555-mg Doc 17346-2 Filed 06/02/11 Entered 06/02/11 20:51:13 Exhibit B (Part 1 of 2) Pg 17 of 62

EXHIBIT A

Wollmuth Maher & Deutsch

500 Fifth Avenue, Suite 1200 One Gateway Center, 9th Fl.
New York, New York 10110 Newark, New Jersey 07102

T: 212-382-3300 T: 973-733-9200 F: 973-733-9292

Lehman Estate

November 17, 2010

File #: 4715-001

Inv #:

Sample

Attention:

RE:

SPV Avoidance Litigation

SUMMARY BY TASK

Task		Hours	Amount
C11	Avoidance Action Litigation	943.45	414,045.75
C16	Travel	2.60	1,407.00
	Total	946.05	\$415,452.75
	Grand Total	946.05	\$415,452.75

SUMMARY BY TIMEKEEPER

		This Invoice		
Timekeeper	Category	Rate	Hours	Amount
William A. Maher	Senior Partner	595.00	47.10	28,024.50
Paul R. DeFilippo	Senior Partner	615.00	52.50	32,287.50
Sandip Bhattacharji	Partner	550.00	57.50	31,625.00
Randall R.Rainer	Partner	550.00	91.30	50,215.00
James N. Lawlor	Partner	550.00	104.70	57,585.00
Vince Chang	Partner	550.00	47.90	26,345.00
William F. Dahill	Partner	550.00	6.90	3,795.00
Michael C. Ledley	Junior Partner	495.00	82.55	40,862.25
Adam M. Bialek	Associate	395.00	183.30	72,403.50
Christopher G. Passavia	Associate	250.00	28.40	7,100.00
John D. Giampolo	Associate	350.00	110.30	38,605.00
Alexis Castillo	Associate	250.00	82.70	20,675.00
Matthew Bost	Paralegal	110.00	8.90	979.00

08-13555-mg Doc 17346-2 Filed 06/02/11 Entered 06/02/11 20:51:13 Exhibit B (Part 1 of 2) Pg 19 of 62

Invoice #:	Sample]	Page 2	!	No
Rebecca Regan	Paralegal	110.00	0.50	55.00	
Martina Frederick	Paralegal	110.00	1.20	132.00	
Evelina A. Grezak	Paralegal	110.00	3.20	352.00	
Kyle J. Dumas	Paralegal	110.00	3.40	374.00	
Agatha D. Rysinsl	ci Paralegal	110.00	0.60	66.00	
Katia Sperduto	Paralegal	120.00	33.10	3,972.00	
Total			946.05	\$415,452.75	

Date	Description	Hours	Amount	Lawyer
Sep-09-10	Correspondence reviewed; Review emails from WAM re: new matter for LBSF; review conflicts listing	1.00	550.00	JNL
	Review & analyze docs, pleadings, transcripts; Review Lehman Bankruptcy Docket re:	0.80	440.00	JNL
	matters referencing CDO issues Review & analyze docs, pleadings, transcripts; Review and analysis of Third Amended Order Establishing Procedures for Interim Compensation of Professionals in Lehman	0.50	175.00	JDG
	Brothers Holdings Inc. Legal research; Researching docket for all orders regarding procedure for professional compensation	0.40	140.00	JDG
	Review & analyze docs, pleadings, transcripts; Review of all previous orders regarding	1.10	385.00	JDG
	professional compensation Review & analyze docs, pleadings, transcripts; Review and analysis of the US Active SPV	0.30	105.00	JDG
	Avoidance Spreadsheet Review & analyze docs, pleadings, transcripts; Review and analysis of the US Active ABS	0.30	105.00	JDG
	CD Initial Investors Spreadsheet Preparation of pleading & briefs; Master List of Transactions regarding subordinated	0.50	175.00	JDG
	receivables - received from co-counsel Review & analyze docs, pleadings, transcripts; Review and analysis of background email memo from co-counsel regarding background of the SPV litigation	0.20	70.00	ЉG
	Review & analyze docs, pleadings, transcripts; Review and analysis of opinion from the 10th	0.60	210.00	JDG
	Review & analyze docs, pleadings, transcripts; Review and analysis of working draft of the SPV avoidance actions complaint received from co-counsel	0.70	245.00	ЉG
Sep-10-10	Send lengthy email to WMD team summarizing initial background information obtained from Weil in call yesterday, and addressing next steps	0.50	297.50	WAM
	Participate in lengthy conf call w/Weil, Curtis-Mallet and WMD team re: background,	1.50	892.50	WAM
	status, issues, strategy and next steps Conf w/WMD team re: post-call issues, strategy, next steps and assignments	0.50	297.50	WAM
	Receive numerous emails from Weil and Curtis-Mallet re: background docs and materials and send numerous emails arranging for the docs to be placed on the system	0.50	297.50	WAM

Review draft pleadings and related materials	2.00	1,190.00	WAM
provided by Weil and Curtis-Mallet	1.00	505.00	XX7.4.X.4
Meet w/WMD team to address draft pleadings, issues, status, strategy and next steps	1.00	595.00	WAM
Correspondence reviewed; Review	4.80	2,952.00	PRD
background facts, conf call w/WGM and		,	
Curtis, conf call w/WMD team			
Telephone calls; Conf call re: ipso facto claims	1.50	825.00	SCB
against CDO issuers Internal office mtgs w/applicants' staff; Mtg	1.50	825.00	SCB
w/working group re: drafting of complaint,	1.30	623.00	SCB
review of docs			
Review & analyze docs, pleadings, transcripts;	5.00	2,750.00	SCB
Review Pyxis and Pebble Beach deal docs;			
review draft complaints prepared by Weil			
Gotshal and Curtis-Mallet; review BNY			
decision Correspondence reviewed; Review	0.40	220.00	DDD
background email from WAM; review	0.40	220.00	RRR
additional emails/docs received			
Internal office mtgs w/applicants' staff; Call	1.70	935.00	RRR
w/Weil, Curtis team re: background, issues to			
consider			
Internal office mtgs w/applicants' staff; O/cs	4.90	2,695.00	RRR
w/Team re: assignment/logistics; o/c w/MCL,			
AMB re: background of dispute/claims, assignment, next steps, timing; o/cs w/AHC re:			
same; follow up o/c w/team re: issues arising			
from draft complaints, additional pleading			
issues/claims, class allegation issues, next			
steps; o/c w/AMB re: identifying initial			
noteholders; o/c w/MCL, AMB re: ideas for			
merging Weil and Curtis-Mallet drafts			
Organize files; O/c w/KLS re:	1.00	550.00	RRR
organization/saving of electronic background docs received; o/c w/SCB, KLS, EAG re:			
prep/organization of SPV deal docs for review			
by SCB			
Review of file; Review draft complaints	4.30	2,365.00	RRŔ
prepared by Debtor's counsel			
Correspondence reviewed; Review emails	0.70	385.00	JNL
outlining issues for conference call with WGM			
Telephone calls; Conf. call with WMD, Weil	1.60	880.00	JNL
and Curtis Mallet re: LBSF CDO litigation			
issues; follow up calls with WAM, RRR and VTC			
Review & analyze docs, pleadings, transcripts;	3.00	1,650.00	JNL
Begin review of CDO materials	2.00	-,	VI 12
Internal office mtgs - 3rd party conf; Internal	1.50	825.00	VTC
office mtgs re: litigation strategy			

T/cs; Conf call w/Weil and C. Malet	2.00	1,100.00	VTC
Review & analyze docs, pleadings, transcripts: Review and analyze draft complaints, other	1.00	550.00	VTC
docs			
Legal research; Legal research re: class certification	3.00	1,650.00	VTC
Review of file; Initial review of draft evidence	0.30	165.00	WFD
complaint v. non-distributed note holders			
T/cs; T/c w/WGM and CMP teams re:	1.80	990.00	WFD
assignment to prep complaints v. note holders			
and trustee for distributed funds	0.20	165.00	*****
Internal office mtgs w/applicants' staff; Confs	0.30	165.00	WFD
w/WMD team on tasks to prep on complaints	0.20	165.00	II II II
Internal office mtgs w/applicants' staff; Conf	0.30	165.00	WFD
w/AMB re: drafting/research issues for			
avoidance complaint Review & analyze docs, pleadings, transcripts;	2.40	1,320.00	WFD
Review draft complaints v. distributed note	2.40	1,320.00	WID
holders, Pyxis and Pebble Creek			
Internal office mtgs w/applicants' staff; Conf	0.50	275.00	WFD
w/WAM re: consolidation of claims issue; o/c			
w/RRR re: same			
Review & analyze docs, pleadings, transcripts;	0.90	495.00	WFD
Review BNY decision re potential application			
to complaint to be drafted			
Internal office mtgs w/applicants' staff; O/c	0.75	371.25	MCL
w/RRR, AMB re: background of			
disputes/claims, assignments, next steps,			
timing Correspondence reviewed; Rev'd WAM email	0.30	148.50	MCL
re: background	0.30	148.30	MCL
Review & analyze docs, pleadings, transcripts;	3.50	1,732.50	MCL
Rev'd draft Weil and Curtis Mallet	3.30	1,732.30	MCL
complaints, Pyxis ISDA docs			
Internal office mtgs w/applicants' staff; O/c	1.50	742.50	MCL
w/WMD team re: strategy, next steps		, ,_,,	1.102
Correspondence reviewed; SCB email re:	0.50	247.50	MCL
summary of transaction docs			
Correspondence reviewed; Review emails re:	0.10	39.50	AMB
new matter			
Internal office mtgs w/applicants' staff; Long	2.30	908.50	AMB
mtg w/WAM, VTC, RRR, SCB and MCL re:			
disputes/claims, assignments and next steps			
Legal research; Conduct legal research on	0.60	237.00	AMB
irreparable harm, unjust enrichment, and class			
certification	0.10	20.50	43.00
Correspondence reviewed; Review emails	0.10	39.50	AMB
form PRD re: agenda for call w/WMD Team	0.20	70.00	A3 CD
Review of file; Review SCB's summary of Pebble Creek docs	0.20	79.00	AMB
I COUIT CITCH GOES			

Review of file; Review SCB's summary of Pyxis docs	0.20	79.00	AMB
Internal office mtgs w/applicants' staff; O/c w/MCL and re: background of disputes/claims,	0.70	276.50	AMB
assignments, next steps, timing Review of file; Review Pyxis draft complaint	0.50	197.50	AMB
Review of file; Review draft complaint for avoidance action	0.60	237.00	AMB
Review & analyze docs, pleadings, transcripts; Review Pyxis background materials	0.60	237.00	AMB
Review & analyze docs, pleadings, transcripts; Review Pebble Creek background materials	0.50	197.50	AMB
Correspondence reviewed; Review emails re: background information	0.20	79.00	AMB
Review & analyze docs, pleadings, transcripts; Review and analyze spread sheets re: distributed deals and possible defendant	3.00	1,185.00	AMB
identifications Review of file; Review Pebble Creek draft complaint	0.40	158.00	AMB
Telephone calls; Conference call with Debtors' lead and conflicts counsel	0.50	175.00	JDG
Review & analyze docs, pleadings, transcripts; Lehman Bro Special Financing v. BNY Corp. Trustee Services opinion from Jan. 2010 in SDNY	0.50	175.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of Indenture CDO - Pebble Creek, as Issuer and Citibank as Trustee, dated March 2007	1.10	385.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of Portfolio Management Agreement for Indenture Collateralized Debt Obligations - Pebble Creek, as Issuer and	0.40	140.00	JDG
Citibank as Trustee, dated March 2007 Review & analyze docs, pleadings, transcripts; Review and analysis of ISDA Master Swap Credit Agreement, dated March 2007 among Lehman Bro. Special Financing and Pebble	0.50	175.00	JDG
Creek Review & analyze docs, pleadings, transcripts; Review and analysis of schedule to ISDA Master Swap Credit Agreement, dated March 2007 among Lehman Bro. Special Financing and Pebble Creek	0.30	105.00	ЉG
Review & analyze docs, pleadings, transcripts; Review and analysis of march 22, 2007 confirmation to ISDA Master Swap Credit	0.30	105.00	ЛDG

Agreement among Lehman Bro. Special Financing and Pebble Creek			
Review & analyze docs, pleadings, transcripts; Review of Sept. 2008 notice of early termination of the ISDA Master Agreement	0.10	35.00	ЉG
Review & analyze docs, pleadings, transcripts; Review of Sept. 2008 Notice of Default for ISDA Master Agreements due to Lehman's bankruptcy	0.20	70.00	JDG
Review & analyze docs, pleadings, transcripts; Review of Sept. 2008 Notice of Acceleration regarding Indenture due to event of default	0.10	35.00	JDG
Review & analyze docs, pleadings, transcripts; Review of Sept. 2008 Calculation Notice regarding early termination of the ISDA Master Agreement	0.10	35.00	JDG
Review & analyze docs, pleadings, transcripts; Review of Oct. 2008 Payment Date Report regarding Calculation Notice re early termination of the ISDA Master Agreement	0.10	35.00	ЛDG
Review & analyze docs, pleadings, transcripts; Review of Oct. 2008 Factor Statement re Payment Date Report regarding Calculation Notice re early termination of the ISDA Master Agreement	0.10	35.00	JDG
Telephone calls; Calls to Debtors' counsel re: retention issues	0.10	35.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of march 2007 Indenture - PYXS, as Issuer and LaSalle Bank, as Trustee	1.30	455.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of International Swap Agreement among Lehman and PYXIS	0.60	210.00	ЛDG
Review & analyze docs, pleadings, transcripts; Review and analysis of Schedule to International Swap Agreement among Lehman and PYXIS	0.30	105.00	ЛDG
Review & analyze docs, pleadings, transcripts; Review and analysis of Support annex to International Swap Agreement among Lehman and PYXIS	0.40	140.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of Confirmation for CMBS/RMBS Securities	0.40	140.00	ЉG
Review & analyze docs, pleadings, transcripts; Review and analysis of Confirmation for CDO Securities	0.30	105.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of March 2007 Class A Note Purchase Agreement - PYXIS	0.50	175.00	JDG

Review & analyze docs, pleadings, transcripts; Review and analysis of Feb. 2008 Notice of	0.10	35.00	JDG
Event of Default re Indenture - PYXIS Review & analyze docs, pleadings, transcripts; Review and analysis of Feb. 2008 Notice of Acceleration re Event of Default re Indenture -	0.10	35.00	ЛDG
PYXIS Review & analyze docs, pleadings, transcripts; Review of Sept. 2008 letters from LaSalle re early termination of Swap and Indenture	0.30	105.00	JDG
agreements Review & analyze docs, pleadings, transcripts; Review of Notice of Direction to Dispose of Collateral	0.20	70.00	JDG
Preparation of pleading & briefs; Working draft of complaint for declaratory judgment and permanent injunction re PYXIS received from co-counsel	0.50	175.00	ЛDG
Preparation of pleading & briefs; Working draft of complaint re Pebble Creek received from co-counsel	0.40	140.00	JDG
Review & analyze docs, pleadings, transcripts; Review of retention application filed in Lehman bankruptcy by lead and conflicts counsel	0.30	105.00	JDG
Preparation of pleading & briefs; Prepared first draft of the Affidavit in Support of Retetion of Wollmuth Maher as Special Counsel	3.50	1,225.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of memo regarding priority of payments under Pyxis documents	0.20	70.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of Amended and Restated Indenture - Crown City CDO 2005-2 LTD	0.70	245.00	JDG
Internal office mtgs w/applicants' staff; o/c w/MCL re: case background, next steps	0.50	125.00	AHC
Internal office mtgs w/applicants' staff; O/cs w/ RRR and KLS re: work on SPV complaint	0.20	22.00	EAG
Organize files: Save background docs, emails with attachments, draft complaints on the system per WAM's request; print out and distribute docs re: same; create file for WAM's working set of case docs; create WGL for matter and update same	2.00	240.00	KLS
Internal office mtgs w/applicants' staff: O/cs and emails w/WAM, RRR, SCB, EAG re: upcoming assignments including printing and organizing transaction docs for 49 transactions for SCB's review over the weekend, staffing and logistics for same	0.60	72.00	KLS

•	1 , , , , , , , , , , , , , , , , , , ,			
· Sep-11-10	Emails to/from Weil and WMD team re: status, call w/clients and next steps	0.40	238.00	WAM
	T/cs w/RRR re: status, draft pleading, issues and next steps	0.40	238.00	WAM
	Review VTC summary of class action research	0.30	178.50	WAM
	Internal office mtgs w/applicants' staff; Mtg w/RRR, MCL re: review of CDO deal docs	1.00	550.00	SCB
	Review & analyze docs, pleadings, transcripts; Review transaction files for CDO transactions to be included in complaint	5.00	2,750.00	SCB
	Review of file; Read BNY decision; note key issues in same	1.20	660.00	RRR
	Internal office mtgs w/applicants' staff; Lengthy mtg w/SCB, MCL re: vetting contract based termination claims in Curtis-Mallet drafts to include in complaint	1.50	825.00	RRR
	Internal office mtgs w/applicants' staff; O/cs w/KLS, AMB re: deal docs to include in binders prepped for SCB's review;	1.20	660.00	RRR
	coordination re: same Factual Investigation; O/cs w/AMB to review charts from Weil re: identifying Trustees, Noteholders, emails w/Weil re: same; o/cs	0.90	495.00	RRR
	w/AMB re: next steps Correspondence/memoranda drafted; Emails to/from RRR, PRD, WAM re: CDO materials and status of complaint	1.10	605.00	JNL
	Review & analyze docs, pleadings, transcripts; Review complaint drafts and comment on same	1.50	825.00	JNL
	Review & analyze docs, pleadings, transcripts; Begin review of CDO materials	2.00	1,100.00	JNL
	Review & analyze docs, pleadings, transcripts; Review and analyze draft complaints, other docs	0.50	275.00	VTC
	Legal research; Legal research and memo re: class certification	3.50	1,925.00	VTC
	Legal research; Legal research and memo re: firm's retention issues (US Bank)	4.00	2,200.00	VTC
	Internal office mtgs w/applicants' staff; Rev'd RRR emails re: research on unjust enrichment; o/cs w/RRR re: structure of complaint and causes of action; email exchange w/SCB re: flip provisions; o/cs w/SCB re: terms of transaction docs	2.30	1,138.50	MCL
	Review & analyze docs, pleadings, transcripts; Rev'd LBSF v. BNY decision; rev'd VCT memo re: class action issues; rev'd BB memo re: summary of newly received transaction docs	1.50	742.50	MCL

Preparation of pleading & briefs; Draft complaint	3.00	1,485.00	MCL
Legal research; Conduct legal research re:	1.00	395.00	AMB
various issues (irreparable harm, unjust enrichment, third-party beneficiary claims)	0.20	70.00	AMD
Correspondence reviewed; Review email from PRD re: ipso facto and SOL	0.20	79.00	AMB
Correspondence reviewed; Review emails	0.10	39.50	AMB
from KLS re: deal docs that are missing			
Correspondence reviewed; Review emails and	0.20	79.00	AMB
research re: conflict issue			
Correspondence reviewed; Review research	0.20	79.00	AMB
from VTC re: Class Action claims			
Preparation of pleading & briefs; Create	2.00	790.00	AMB
schedules for complaint			
Review & analyze docs, pleadings, transcripts;	2.00	790.00	AMB
Analyze noteholder spreadsheets to obtain			
identity of possible defendants	0.50	4 - 6 - 6	
Review & analyze docs, pleadings, transcripts;	0.70	276.50	AMB
Analyze deal spreadsheets to obtain names of			
possible defendants Proposition of pleading & briefs; greate	0.30	118.50	AMB
Preparation of pleading & briefs; create	0.30	118.30	AMB
caption for Complaint	0.10	20.50	43.00
Correspondence reviewed; Review email re:	0.10	39.50	AMB
Jones Day unable to clear conflicts	0.20	110.50	4.) (D
Correspondence/memoranda drafted; Email to/from VTC re: research re: class certification	0.30	118.50	AMB
	0.10	20.50	43.40
Correspondence reviewed; Review email from WAM re: 930 a.m. call w/WGM	0.10	39.50	AMB
	2.10	1 005 00	TD C
Legal research; Whether the 2yrs SOLs under Sec. 546 apply to	3.10	1,085.00	JDG
** *	0.60	210.00	TDC
Correspondence/memoranda drafted; Email	0.60	210.00	JDG
memo re legal research - the 2yrs SOLs under Sec. 546			
Review & analyze docs, pleadings, transcripts;	1.10	385.00	JDG
Reviewed proofs of claim filed in Lehman	1.10	303.00	320
bankruptcy relevant to our Retention Affidavit			
Preparation of pleading & briefs; Drafting	0.90	315.00	JDG
additional paragraphs to the retention affidavit			
Correspondence reviewed; Reviewed memo of	0.30	105.00	JDG
Pyxis transactions documents			
Correspondence reviewed; Reviewed memo of	0.30	105.00	JDG
Indenture and ISDA documents			
Review & analyze docs, pleadings, transcripts;	1.90	665.00	ЛDG
Reviewed LBSF's Motion for Summary			
Judgment in LBSF v. BNY June 10, 2008			
Review & analyze docs, pleadings, transcripts;	0.30	105.00	JDG
Reviewed Declaration of Lee in Support of			

08-13555-mg Doc 17346-2 Filed 06/02/11 Entered 06/02/11 20:51:13 Exhibit B Invoice #: Sample (Part 1 of 2)Pageg 28 pf 62

No

	LBSF's Motion for Summary Judgment in LBSF v. BNY June 10, 2008			
	Review & analyze docs, pleadings, transcripts; Reviewed Principal Trust Deed Dante Fiance as issuer and JP Morgan as Trustee (exhibit to LBSF's summary judgment motion)	2.10	735.00	JDG
	Review & analyze docs, pleadings, transcripts; Reviewed Statement of Undisputed Facts in Support of LBSF's Motion for Summary Judgment	0.40	140.00	JDG
	Review & analyze docs, pleadings, transcripts; Reviewed Memorandum of law in Support of Motion for Summary Judgment of BNY in LBSF v. BNY	0.90	315.00	JDG
	Review & analyze docs, pleadings, transcripts; Reviewed Affidavit of Venditto in Support of Motion for Summary Judgment of BNY in LBSF v. BNY	0.20	70.00	JDG
	Review & analyze docs, pleadings, transcripts; Reviewed Statement of Material Undisputed Facts of BNY regarding Motion for Summary Judgment	0.60	210.00	ЉG
	Review & analyze docs, pleadings, transcripts; Reviewed Statement of Official Committee of Unsecured Creditors in Support of LBSF's Motion for Summary Judgment in LBSF v. BNY	0.70	245.00	ЉG
	Review & analyze docs, pleadings, transcripts; Reviewed LBSF' Memorandum of Law in Opposition to BNY's Motion for Summary Judgment	1.30	455.00	ЉG
	Review of file; review of draft avoidance action pleadings, emails per RRR request	4.00	1,000.00	AHC
	Litigation: Emails w/RRR and o/cs w/RRR, AMB and SCB re: assignments; review list of relevant deals and download files for same from hard drive received from RRR; print and organize relevant docs from each deal and assemble and label binders w/same for SCB's review; o/cs w/EAG re: assistance w/same; draft and send detailed email to RRR and rest	8.50	1,020.00	KLS
Sep-12-10	of team re: missing/incomplete deal doc files Review numerous emails re: draft complaint, applicable SPVs and parties thereto, and related issues, and respond to same	1.00	595.00	WAM
	T/cs w/RRR re: status and timing re: drafting complaint and related matters	0.50	297.50	WAM
	Review Lehman v. Bank of New York bankruptcy case	0.50	297.50	WAM
	Review draft complaint and comment on same	1.50	892.50	WAM

Review & analyze docs, pleadings, transcripts Lehman; Review and revise draft complaints, review selected portions of documents, address	6.50	3,997.50	PRD
issues in connection with various theories Review & analyze docs, pleadings, transcripts; Analyze deal docs and respond to questions redeal docs from working group	3.00	1,650.00	SCB
Preparation of pleading & briefs; Review and comment on draft complaint	1.00	550.00	SCB
Review of file; Review SCB's memo re: initial review of Indentures and other deal docs; review VTC's memo re: class action pleading issues	0.90	495.00	RRR
Preparation of pleading & briefs; Review/revise/circulate MCL's draft of Complaint; review pertinent transaction docs w/r/t same; incorporate others' comments and circulate revised draft Complaint	4.20	2,310.00	RRR
Correspondence/memoranda drafted; Emails w/team members re: comments on draft Complaint and questions, issues, resolutions, next steps re: same; prep/circulate email to team re: status of various projects related to prep of Complaint; multiple emails w/SCB re: terms of deal docs	3.30	1,815.00	RRR
Factual Investigation; Attn to numerous emails/charts re: identification of Issuers, Trustees, Noteholders and AMB's work product re: same and incl. numerous emails w/Weil Gotshal re: same, and re: obtaining additional deal docs to review for distributed SPV deals	2.10	1,155.00	RRR
Telephone calls; T/cs RRR re: open issues on avoidance complaint	0.40	220.00	JNL
Legal research; Additional research on ipso facto, avoidance issues; automatic stay violations and damage claims; review constructive trust arguments	12.00	6,600.00	JNL
Correspondence reviewed; Review emails from VTC re US Bank	0.20	110.00	JNL
Correspondence/memoranda drafted; Multiple emails to/from RRR re: complaint	0.50	275.00	JNL
Correspondence reviewed; Review potential conflict emails	0.90	495.00	JNL
Review & analyze docs, pleadings, transcripts; Review and comment on draft retention affidavit; circulate comments to same; review changes and make further revisions	2.50	1,375.00	JNL
Legal research; Legal research re: class certification	2.50	1,375.00	VTC

Legal research: Legal research and memo re:	4.00	2,200.00	VTC
firm retention conflict issues (US Bank) Review & analyze docs, pleadings, transcripts:	1.50	825.00	VTC
Review and analyze draft complaint	* ^ ^		\
Preparation of pleading & briefs; Draft and revise avoidance complaint	5.80	2,871.00	MCL
Internal office mtgs w/applicants' staff; T/c's	2.00	990.00	MCL
and email exchanges w/RRR, AMB re: complaint, defendants			
Review & analyze docs, pleadings, transcripts;	0.80	396.00	MCL
Analyze subordination provisions re: potential			
breach claim against Noteholders Correspondence reviewed; Review VTC's	0.20	79.00	AMB
research re: Conflicts	0.20	77.00	THIND
Review & analyze docs, pleadings, transcripts;	0.50	197.50	AMB
Review new lists re: trustees and deals for			
schedules for Complaint	0.40		
Correspondence/memoranda drafted; Emails	0.10	39.50	AMB
to/from WS and KLS re: docs provided to identify Defendants			
Correspondence/memoranda drafted; Emails	0.10	39.50	AMB
to/from RRR re: doc provided to identify	0.20	• • • • • • • • • • • • • • • • • • • •	
Defendants			
Internal office mtgs - 3rd party conf; T/c w/A.	0.10	39.50	AMB
Scarpa re: docs sent to WMD to identify			
Defendants Telephone calls; T/c w/W. Sing re: deal doc	0.10	39.50	AMB
review	0.10	39.30	AMD
Correspondence reviewed; Review numerous	0.50	197.50	AMB
emails from PRD, JLR, RRR, SCB, re: draft			
Complaint and possible claims			
Internal office mtgs w/applicants' staff; T/c	0.40	158.00	AMB
w/RRR and MCL re: next steps and status			
update Preparation of pleading & briefs; Prep of list	5.00	1,975.00	AMB
of deals, noteholders and trustees	3.00	1,575.00	7317113
Correspondence reviewed; review email from	0.10	39.50	AMB
RRR re: missing deal docs			
Correspondence reviewed; Review email from	0.10	39.50	AMB
RRR re: value of deals and conflicts			
Correspondence reviewed; Review emails	0.50	197.50	AMB
from SCB re: Terms in Deal docs			
Review & analyze docs, pleadings, transcripts;	0.30	105.00	JDG
Review and analysis of section 6 of the			
Indenture documents re Trustees' liability for			
flip of Payment Priority Correspondence reviewed; Review of email	0.10	35.00	JDG
from Debtors' lead counsel re initial	0.10	33.00	<i>11</i> 0
Noteholder issues			

*				
•	Preparation of pleading & briefs; Drafting additional paragraphs to the retention affidavit	0.60	210.00	JDG
Sep-13-10	for Wollmuth as special litigation counsel Conf call w/Lehman team, Weil team and WMD team to address issues in advance of	0.80	476.00	WAM
	Review numerous emails relating to draft complaint and issues relating to prospective	1.50	892.50	WAM
	filings, and respond to same Conf call w/Curtis Mallet re: Pyxis and Pebble Creek and related issues	0.70	416.50	WAM
	O/cs w/RRR, SCB and MCL following call w/Curtis Mallet re: status, assignments and next steps	0.30	178.50	WAM
	Telephone calls; Conf call w/all hands	1.00	615.00	PRD
	Preparation of pleading & briefs; Work on complaint and review additional theories for inclusion	5.50	3,382.50	PRD
	Internal office mtgs w/applicants' staff; Confer with team re status of projects	1.00	615.00	PRD
	Preparation of pleading & briefs; Revise retention affidavit	1.20	738.00	PRD
	Telephone calls; All hands conf call re: complaints; conf call w/Curtis-Mallet re: comments on WMD draft complaint	1.60	880.00	SCB
	Review & analyze docs, pleadings, transcripts; Review deal files for transactions to be included in complaint	6.00	3,300.00	SCB
	Correspondence/memoranda drafted; Prep summary of transactions reviewed	1.50	825.00	SCB
	Preparation of pleading & briefs; Review and comment upon draft complaint	1.00	550.00	SCB
	Correspondence/memoranda drafted; Attn to emails to/from SCB re: new "Final" list of Issuers, Co-issuers; emails w/AMB re: same, efforts to finalize identification of same and other defendant entities for Complaint; emails w/Weil Gotshal re: same, obtaining add'l deal docs; emails w/Lehman re: info needed re: Noteholder distributees; review/attn to lists re: SPV deals to include in Complaint and re: add'l background/deal docs needed; email to team re: agenda for 9/14 call w/client	2.50	1,375.00	RRR
	Telephone calls; Conf call w/Lehman, outside counsel re: open issues/status re: avoidance actions; conf calls w/S. Collings, Curtis-Mallet re: their comments on draft Complaint; t/c w/S. Collings re: add'l pleading/parties issues in Complaint	1.60	880.00	RRR

Preparation of pleading & briefs; Review/markup revised draft of Complaint;	3.60	1,980.00	RRR
review Harrier briefing in connection w/same Internal office mtgs w/applicants' staff; Numerous o/cs w/MCL, PRD, JNL, SCB re: legal and factual theories/issues/follow up	4.20	2,310.00	RRR
needed re: draft Complaint; o/cs w/VTC, MCL re; class action pleading issues; o/cs w/MCL re: constructive trust, "sale harbor" issues			
Preparation of pleading & briefs; Review and comment on multiple drafts SPV complaint	6.00	3,300.00	JNL
Telephone calls; Conf. call with Lehman in-house counsel, conflicts counsel, WMD	0.80	440.00	JNL
team Legal research; Research SPV complaint legal issues involving avoidance matters and damages for violations of the stay	3.70	2,035.00	JNL
Telephone calls; Conf call WMD, WGM, Curtis and LBSF teams re: SPV complaints	0.70	385.00	JNL
Telephone calls; Multiple t/cs with PRD, RRR, AB and ATC re: procedures for filing	1.50	825.00	JNL
adversary complaint Telephone calls; Multiple conf. with JDG reretention aff. draft and expedited discovery	2.00	1,100.00	JNL
motion Legal research; Research on expedited discovery	1.20	660.00	JNL
Preparation of pleading & briefs; Draft additional paragraphs of retention aff.	0.50	275.00	JNL
Correspondence reviewed; Review multiple emails from WGM and WGM complaints in SPV action	1.00	550.00	JNL
Legal research; Legal research class certification	2.50	1,375.00	VTC
Review & analyze docs, pleadings, transcripts; Review draft complaint on fraudulent transfer, ipso facto	1.00	550.00	VTC
Internal office mtgs w/applicants' staff; Internal team mtg re: ipso facto, fraudulent	1.00	550.00	VTC
transfer Telephone calls; Conf call w/Weil, Lehman re: ipso facto, fraudulent transfer	1.50	825.00	VTC
Internal office mtgs w/applicants' staff; Conf w/AMB, RRR re: schedule, pleading, status,	0.20	110.00	WFD
motion for discovery Preparation of pleading & briefs; Attn to applications for expedited discovery, emails	0.20	110.00	WFD
w/RRR re: same, requirements Preparation of pleading & briefs; Revised complaint	3.50	1,732.50	MCL

Telephone calls; Participated in all hands" o/c w/Lehman; A&M, Weil, WMD	1.60	792.00	MCL
Internal office mtgs - 3rd party conf; O/c w/Curtis Mallet re: comments on brief	0.75	371.25	MCL
Internal office mtgs w/applicants' staff; O/c w/WAM, RRR, VTC re: complaint; t/c w/JNL, J. Gianmpolo; email exchange w/team re: constructive trust; o/cs and email exchanges w/RRR re: revisions to complaint; o/c and email exchanges w/AMB, AHC re: summons, filing logistics	4.20	2,079.00	MCL
Legal research; Research re: constructive trust	0.75	371.25	MCL
Review & analyze docs, pleadings, transcripts; Analyze new deal lists and noteholders lists	3.00	1,185.00	AMB
Preparation of pleading & briefs; Review and edit various versions of the Complaint for filing	3.00	1,185.00	AMB
Internal office mtgs w/applicants' staff; O/cs w/Team re: schedules of Noteholders and Issuers	1.00	395.00	AMB
Correspondence reviewed; Emails to/from team re: schedules for complaint	2.00	790.00	AMB
Review & analyze docs, pleadings, transcripts; Prep of Schedules of Noteholders and Issuers for Complaint	5.00	1,975.00	AMB
Telephone calls Internal office mtgs - 3rd party conf; T/c w/WMD and Lehaman and WGM	1.30	513.50	AMB
Telephone calls; T/c w/RRR, MCL re: next steps and status update	0.50	197.50	AMB
Preparation of pleading & briefs; Prep of country chart and list of noteholders and CUSIP numbers	8.20	3,239.00	AMB
Telephone calls; t/c w/MCL and LLS re: service of process and taking evidence abroad	0.90	355.50	AMB
Legal research; Conduct legal research re: service of docs received from non-parties	2.00	790.00	AMB
Correspondence reviewed; Review emails from PRD, RRR and MCL re: discovery stay motion	0.10	39.50	AMB
Review & analyze docs, pleadings, transcripts; Review opposition to Stay motion	0.40	158.00	AMB
Legal research; Research re: how many deals DB participated in	0.30	118.50	AMB
Internal office mtgs - 3rd party conf; o/c w/AMB re: creation of chart including address and transaction information for each note holder/defendant to be named in the complaint set for filing 9/14; o/c w/MCL and AMB re: additional steps in filing of complaint	0.90	225.00	CGP

No

Factual Investigation; research internet sources, Pacer and court docs for note holder names for more definitive entity and address information; analyze results of research against transactions for match and populate address fields in chart accordingly; note entity and source of information; o/cs w/AHC re: assisting w/research and reformatting chart	3.90	975.00	CGP
Prep of transactional & misc. docs; draft information chart for approximately 85 unique note holders	2.40	600.00	CGP
Review & analyze docs, pleadings, transcripts; Reviewed Memorandum of Law of BNY in Opposition to LBSF's Summary Judgment Motion	0.50	175.00	JDG
Review & analyze docs, pleadings, transcripts; Reviewed Reply Memorandum of Law in further support of BNY's Motion for Summary Judgment	0.70	245.00	JDG
Review & analyze docs, pleadings, transcripts; Reviewed Replay Memorandum of Law of LBSF in Opposition to BNY's Summary Judgment Motion and in Further Support of LBSF's Motion	0.70	245.00	ЛDG
Review & analyze docs, pleadings, transcripts; Reviewed Memorandum Decision Granting Motion for Summary Judgment and Declaring Applicable Payment Priorities in LBSF v. BNY	0.60	210.00	ЉG
Review & analyze docs, pleadings, transcripts; Reviewed Memorandum of Law of BNY in Support of its Motion for Dismissal of Complaint in BNY v. LBSF	0.60	210.00	ЉG
Review & analyze docs, pleadings, transcripts; Reviewed Memorandum of Law of LBSF in Opposition to BNY's Motion for Dismissal of Complaint in BNY v. LBSF	1.20	420.00	JDG
Review & analyze docs, pleadings, transcripts; Reviewed Reply Memorandum of Law of BNY in Further support of Bny's Motion for Dismissal of complaint in LBSF v. BNY	0.40	140.00	JDG
Review & analyze docs, pleadings, transcripts; Reviewed Surreply Memorandum of Law in Further Opposition to Bny's Motion for Dismissal of complaint in LBSF v. BNY	0.60	210.00	JDG
Review & analyze docs, pleadings, transcripts; Reviewed Order Dismissing Bny's Motion for Dismissal of complaint in LBSF v. BNY	0.10	35.00	ЛDG

Telephone calls; Conference call with Debtors' representatives and Debtors' lead counsel re	0.40	140.00	JDG
spv avoidance actions issues Review & analyze docs, pleadings, transcripts; Review and analysis of Section 5 of the Master Swap Agreement re issues surrounding the flip of Priority of Payments	0.20	70.00	ЉG
Review & analyze docs, pleadings, transcripts; Review and analysis of BNY case and key terms of LBSF Swap Agreements to confirm no material differences between LBSF Swap terms and the Swaps in BNY case	0.50	175.00	ЉG
Correspondence reviewed; Review memo summary of Crown City and Phoenix transactions	0.30	105.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of latest working draft of Complaint for SPV Avoidance	0.40	140.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of all exhibit documents to Affidavit of Venditto in Support of Motion for Summary Judgment of BNY in LBSF v. BNY	0.70	245.00	ЛDG
Legal research; Researched for best language to use to plead in the SPV complaint counts to recover from subsequent transferees	0.80	280.00	JDG
Review & analyze docs, pleadings, transcripts; Reviewed statutory language in Sec. 550 for best language to use to plead in the SPV complaint counts to recover from subsequent transferees	0.10	35.00	JDG
Preparation of pleading & briefs; Drafted language in the SPV complaint to plead counts to recover from subsequent transferees	0.80	280.00	ЉG
Review & analyze docs, pleadings, transcripts; Review court rules; email and calls to court re: procedures for filing; o/cs w/AMB, JNL re: same; research on constructive trusts; emails and o/cs w/MCL re: same	5.50	1,375.00	АНС
Preparation of pleading & briefs; prep schedules to be attached to Complaint; research information on Defendants for same; o/cs w/AMB re: same	6.50	1,625.00	АНС
Correspondence/memoranda drafted; Convert PDF of Summons and Notice of Pretrial Conference in an Adversary Proceeding to Word, then clean up	0.40	44.00	MEB
Correspondence/memoranda drafted; Print docs for AMB	0.70	77.00	MSF
Correspondence/memoranda drafted; Print and assemble deal docs into binders	2.30	253.00	EAG

No

	Preparation of pleading & briefs; Purchase 25 binders at staples	0.40	44.00	KJD
	Litigation: Review emails from RRR and o/cs w/AMB re: new deal docs received from Weil/Lehman and assignments re: same; o/cs w/EAG re: assisting w/same; print out and organize deal docs and assemble binders w/same for SCB's review; save same on the system; draft and send email to team re: additional missing deal files/information; emails and o/cs w/RRR and AMB; make additional binders for SCB's review; review email from WAM and print out cases for his review re: draft complaint	8.30	996.00	KLS
Sep-14-10	Conf call w/Hommel, McMurray and WMD team re: comments on draft complaint, open	0.50	297.50	WAM
	issues, next steps and follow up Review numerous emails relating to draft complaint and issues relating to prospective filings, and respond to same	1.70	1,011.50	WAM
	Review and comment on drafts of various submissions	2.50	1,487.50	WAM
	O/cs w/various WMD personnel re: status, open issues, responses to same and next steps	1.00	595.00	WAM
	Telephone calls; conf call w/client re complaint	0.70	430.50	PRD
	Internal office mtgs w/applicants' staff; Confer w/team re class action issues	0.50	307.50	PRD
	Review & analyze docs, pleadings, transcripts; Review and revise motion for expedited discovery	2.30	1,414.50	PRD
	Review & analyze docs, pleadings, transcripts; Review WGM draft motion for stay	1.50	922.50	PRD
	Telephone calls; Conf call w/T. Hummel, L. McMurray re: draft complaint	0.50	275.00	SCB
	Prep of transactional & misc. docs; Review draft complaint	1.00	550.00	SCB
	Review & analyze docs, pleadings, transcripts; Review additional Ruby, Saphir and Radian transaction files; review Pyxis distribution report and Pyxis transaction docs	5.00	2,750.00	SCB
	Internal office mtgs w/applicants' staff; Numerous o/cs w/MCL re: comments/revisions re: draft Complaint and related issues; numerous o/cs w/AMB re: diligence on indentification of defendants and summons/filings format and logistics; o/cs w/SCB re: remaining questions re: deal docs	2.20	1,210.00	RRR

	eeded and issues arising in same, including			
	e: CIBC commitment fees; o/cs w/WAM,			
	PRD re: status, open issues; o/cs w/MCL,			
P	AMB re: electronic filing issues re: Complaint			
	reparation of pleading & briefs; Review	1.30	715.00	RRR
C	Curtis-Mallet comments on draft Complaint;			
r	eview final revised Complaint, schedules of			
L	Defendants			
P	reparation of pleading & briefs;	3.50	1,925.00	RRR
F	Review/revise/incorporate PRD's comments			
	e: JG's draft motion seeking expedited			
	iscovery and circulate same			
	actual Investigation; Further diligence on	0.60	330.00	RRR
	inal identification of distributed deals,	0,00	000.00	2441
	ncluding multiple o/cs w/AMB re: same			
	elephone calls; Conf call w/clients, team re:	1.50	825.00	RRR
	raft Complaint, open issues, factual	1.50	023.00	raac
	nformation still needed; t/cs w/S. Collings re:			
	inal identification of defendants, coordination			
	f motions, filing logistics	1.70	025.00	nnn
	Correspondence/memoranda drafted; Multiple	1.70	935.00	RRR
	mails w/S. Collings, clients, AMB re: add'l			
	nfomation needed and confirming final list of			
	istributed SPV deals for Complaint; email to			
	Curtis-Mallet re: potential commitment fee			
-	ayments to CIBC as part of Pyxis distribution			
	reparation of pleading & briefs; Begin	0.40	220.00	RRR
	eviewing/revising Weil's draft motion for stay			
	f avoidance actions			
	eview & analyze docs, pleadings, transcripts;	3.90	2,145.00	JNL
R	eview and comment on draft SPV complaint			
T	elephone calls; Multiple t/cs with RRR, AB	1.00	550.00	JNL
a	dn ATC re: procedures for filing adversary			
	omplaint			
	elephone calls; Conf. call with Lehman	1.50	825.00	JNL
ir	n-house counsel, conflicts cousnel, WMD			
	eam			
T	elephone calls; Multiple conf. with JAG re:	1.30	715.00	JNL
	xpedited discovery motion			
	egal research; Additional research on	1.70	935.00	JNL
	spedited discovery	1.70	755.00	3112
	eview & analyze docs, pleadings, transcripts;	1.00	550.00	JNL
	eview and revise expedited discovery motion	1.00	330.00	JNL
	•	2.00	1 100 00	** **
	eview & analyze docs, pleadings, transcripts;	2.00	1,100.00	JNL
	eview disclosures and add additional ones in			
	etention aff	. = .	205.00	
	reparation of pleading & briefs; Revise	0.70	385.00	JNL
re	tention aff.			

Review & analyze docs, pleadings, transcripts; Review WGM complaints in SPV action and	1.50	825.00	JNL
WGM draft motion for stay of litigation Review & analyze docs, pleadings, transcripts; Review draft complaint	0.80	440.00	VTC
Legal research; Research various class cert issues	1.00	550.00	VTC
Review & analyze docs, pleadings, transcripts; Review draft motion to expedite discovery and o/cs re: same	0.50	275.00	VTC
Internal office mtgs - 3rd party conf; Internal team mtg re: draft complaint	0.50	275.00	VTC
Telephone calls; Conf call w/client re: draft complaint	0.60	330.00	VTC
Internal office mtgs - 3rd party conf; O/c w/L. McMurray, T. Hommel, WAM, PRD, VCT;	1.20	594.00	MCL
rev'd Curtis Mallet comments to complaint Internal office mtgs w/applicants' staff; O/c and internal emails w/team re: finalization of complaint	2.50	1,237.50	MCL
Preparation of pleading & briefs; Revised complaint; rev'd and edited summons; finalized docs for electronic filing	5.80	2,871.00	MCL
Factual Investigation; Investigation re: names and addresses of noteholders	2.20	1,089.00	MCL
Telephone calls; T/c w/WMD and LB re: Complaint	0.70	276.50	AMB
Correspondence/memoranda drafted; Nnmerono emails to/from Team re: Complaint, schedules, finalize Complaint, coordination of filing	1.00	395.00	AMB
Preparation of pleading & briefs; Prep of schedules	3.50	1,382.50	AMB
Telephone calls; T/cs w/Weil re: filing complaint	0.30	118.50	AMB
Prep Complaint and schedules for filing	9.00	3,555.00	AMB
Legal research; Legal research for caselaw and statutory law to support Motion to Allow Expedited Discovery regarding the SPV Avoidance Complaint	2.20	770.00	JDG
Preparation of pleading & briefs; Preparing first draft of Motion and proposed order to Allow Expedited Discovery regarding the SPV Avoidance Complaint	4.10	1,435.00	JDG
Preparation of pleading & briefs; Drafted additional paragraphs to Motion and proposed order to Allow Expedited Discovery regarding	0.90	315.00	ЉG
the SPV Avoidance Complaint Preparation of pleading & briefs; Drafted additional paragraphs and changes to the	2.30	805.00	JDG

Sep-15-10

retention affidavit for Wollmuth as special counsel			
Preparation of pleading & briefs; research information for schedules; prepare, review and finalize same; o/cs w/MCL, AMB re: same;	12.00	3,000.00	АНС
e-file complaint Litigation: O/c w/AHC re: filing complaint this evening and email her ECF log-in and payment info for same; O/cs w/WAM and copy and scan three articles from today's Financial Times newspaper re: Lehman	0.80	96.00	KLS
Brothers and circulate same to the team via email; run blackline of summons and email same to AHC per her request; o/cs and emails w/RRR and AMB re: deal files; email Radian deal docs to SCB, AMB and RRR			
Review motion for expedited discovery and comment on same, and o/c w/RRR re: comments on same	1.00	595.00	WAM
Review motion for stay	0.30	178.50	WAM
Review numerous emails from WMD team re: various filings today, issues re: same, and timing	0.40	238.00	WAM
Telephone calls; T/cs w/ECF office re: same and updating docket for case re: attorney listing and notification	0.60	357.00	WAM
Correspondence/memoranda drafted; Draft letter to ECF office w/instructions for updating case docket and send out same via email	0.20	119.00	WAM
Preparation of pleading & briefs; update WGL per RRR's request	3.30	1,963.50	WAM
Preparation of pleading & briefs; Revise retention papers and motion for expedited discovery	1.10	676.50	PRD
Review & analyze docs, pleadings, transcripts; Review draft presentation re: BoFA/ML derivative claims	1.00	550.00	SCB
Organize files; File/organize numerous emails/attachments received 9/10-9/14	1.40	770.00	RRR
Preparation of pleading & briefs; Review/incorporate WAM's, VTC's, PRD's and JNL's comments on revised draft of motion for expedited discovery; further revisions to same; finish reviewing/revise Weil's draft motion for stay, incorporate Weil's	3.60	1,980.00	RRR
comments on motion for expedited discovery Telephone calls; T/cs w/S. Singh, S. Collings, AHC re: Weil comments on motion for expedited discovery and filing timing/logistics re: same	0.60	330.00	RRR

Internal office mtgs w/applicants' staff; O/cs w/team re: service requirements of CMO, coordination w/Epiq and Weil re: same w/r/t motion for expedited discovery	0.80	440.00	RRR
Preparation of pleading & briefs; Additional revisions to retention aff.	2.60	1,430.00	JNL
Review & analyze docs, pleadings, transcripts; Review filed SPV complaint	0.30	165.00	JNL
Correspondence/memoranda drafted; Review and respond to emails from RRR and PRD re: Motion to Exp. Disc.	0.50	275.00	JNL
Telephone calls; Multiple t/cs RRR re: issues with Motion for Exp. Disc.	0.70	385.00	JNL
Review & analyze docs, pleadings, transcripts; Review revised Motion for Exp. Disc. and comment on same	1.10	605.00	JNL
Correspondence reviewed; Review emails from WGM and Curtis re: SPV filing status and motions	0.40	220.00	JNL
Review & analyze docs, pleadings, transcripts; Review WGM Motion for stay of all litigation	0.60	330.00	JNL
Review & analyze docs, pleadings, transcripts; Review draft motion to expedite discovery and o/cs re: same	0.60	330.00	VTC
Review & analyze docs, pleadings, transcripts; Rev'd press clippings re: CIBC response to complaint	0.50	247.50	MCL
Internal office mtgs w/applicants' staff; T/c's and email exchanges w/RRR, AMB, AC re:	1.00	495.00	MCL
motion for expedited discovery Preparation of pleading & briefs; Revised and finalized filing of motion for expedited	2.50	1,237.50	MCL
discovery Telephone calls; T/c w/C. Stauble re: summons	0.10	39.50	AMB
Preparation of pleading & briefs; Review emails from WMD Team re: service of Motion for expedited discovery	0.40	158.00	AMB
Telephone calls; T/c w/RRR and S. Collings re: whether Soc. Gen is correct defendant	0.20	79.00	AMB
Internal office mtgs w/applicants' staff; O/c w/RRR re: Soc. Gen issue re: correct	0.30	118.50	AMB
defendant Review & analyze docs, pleadings, transcripts; Review docket for relevant court orders and circulate the same to Team	0.70	276.50	AMB
Correspondence/memoranda drafted; Prep of email to C. Stauble re: Avoidance action summary chart	0.30	118.50	AMB
Preparation of pleading & briefs; Prep of avoidance action summary chart	0.30	118.50	AMB

Telephone calls; O/cs w/AHC and RRR re: same	0.30	118.50	AMB
Preparation of pleading & briefs; Prepared first draft of the Notice of Motion for the Motion to Allow Expedited Discovery regarding the SPV Avoidance Complaint	0.90	315.00	ЉG
Preparation of pleading & briefs; Drafted additional paragraphs and changes to the retention affidavit for Wollmuth as special counsel	1.50	525.00	JDG
Preparation of pleading & briefs; Drafted additional paragraphs to Motion and proposed order to Allow Expedited Discovery regarding the SPV Avoidance Complaint	1.10	385.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of Complaint filed by Sola Ltd against LBSF and JP Morgan in an adversary proceeding	0.50	175.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of Stipulation of Settlement for Complaint filed by Sola Ltd against LBSF and JP Morgan in an adversary proceeding	0.40	140.00	JDG
Review of docket, e-filing notifications; numerous o/cs w/RRR, KLS, Bankruptcy Court re: updating notifications, obtaining log-in information, updating information on docket; review of case management materials and o/cs w/RRR, MCL, AMB re: same for purposes of filing expedited discovery motion and service of same	1.20	300.00	АНС
Locate and obtain Examiner's report per PRD, WAM request and o/cs w/KLS re: same; locate bankruptcy materials per WAM request for litigation team review and o/cs w/KLS re: same	1.50	375.00	АНС
Preparation of pleading & briefs; Prep materials for service of expedited discovery motion and numerous o/cs and t/cs re: same	2.00	500.00	АНС
O/cs and t/cs w/RRR, MCL, AMB, S. Singh re: next steps for filing; review emails re: same	0.50	125.00	AHC
Prep of transactional & misc. docs; Print out, organize and label voluminous Examiner's Report and Appendices to same (9 volumes) in binders and distribute same to WAM and PRD	0.30	33.00	MEB
Litigation: Download and fill-out ECF registration forms for WAM and MCL for SDNY Bankruptcy Court and distribute same to WAM and MCL for review and signature,	0.60	72.00	KLS

	notarize same, scan and save same on the			
Sep-16-10	system and send out same via first-class mail Review emails re: motion for stay and review final version as filed	0.30	178.50	WAM
	Review Second Amended Order re: Case Management Procedures	0.30	178.50	WAM
	O/c w/RRR re: status and next steps	0.10	59.50	WAM
	Review & analyze docs, pleadings, transcripts; Review select portions of examiner report re	2.80	1,722.00	PRD
	avoidance claims Rev'd and finalized motion for expedited discovery for filing	3.50	1,732.50	MCL
	T/c's and email correspondence w/Weil re: mechanics of filing	1.50	742.50	MCL
	Rev'd email correspondence re: SPV complaints	0.50	247.50	MCL
	Correspondence reviewed; Review email from S. Singh re: filing stay motion	0.10	39.50	AMB
	Correspondence/memoranda drafted; Prep of email to Epiq re: affidavit of service	0.30	118.50	AMB
	Correspondence reviewed; Review email re: revised Summons; email to WMD Team re: same	0.10	39.50	AMB
	Correspondence reviewed; Review emails from MCL and Epiq re: serving motion	0.10	39.50	AMB
	Correspondence reviewed; Review emails from S. Christopher and MCL re: date of hearing for motion for expedited discovery	0.10	39.50	AMB
	Correspondence reviewed; Review email from RRR re: LB's motion to stay	0.10	39.50	AMB
	Review & analyze docs, pleadings, transcripts; Review of Weil's draft of the Motion to Stay SPV Avoidance Actions	0.80	280.00	JDG
	Preparation of pleading & briefs; Drafting Notice paragraph provisions for service of notice of Debtors' Motion for Expedited Discovery in SPV Avoidance actions	0.50	175.00	JDG
	Legal research; Research and analysis of issues surrounding effecting proper service of the SPV Avoidance action Complaint on the large volume of interested parties and defendants	0.50	175.00	JDG
	Review & analyze docs, pleadings, transcripts; Review and analysis of Orders entered for Procedures for Compensation and Retention of Ordinary Course Professionals	0.40	140.00	JDG
	Correspondence/memoranda drafted; Email memo re my review and analysis of Orders entered for Procedures for Compensation and Retention of Ordinary Course Professionals	0.20	70.00	ЉG

Sep-17-10

, , , , , ,			
Preparation of pleading & briefs; Drafted additional paragraphs to Motion and proposed order to Allow Expedited Discovery regarding the SPV Avoidance Complaint regarding	0.40	140.00	JDG
jurisdiction Preparation of pleading & briefs; Drafted additional paragraphs and changes to the retention affidavit for Wollmuth as special litigation counsel - including new language	2.10	735.00	JDG
regarding Sola representation			
Preparation of pleading & briefs; Attention to various issues re: filing of expedited discovery	0.80	200.00	AHC
motion; file same and o/cs w/MCL re: same Preparation of pleading & briefs; Prep binder	0.10	11.00	MEB
per AMB	0.40	238.00	WAM
O/cs w/RRR re: status, recent communications and next steps	0.40	238.00	W AIVI
Meet w/WMD team re: status, service of complaint, discovery required re: Noteholders, and process and timing for obtaining same,	1.00	595.00	WAM
and related issues Internal office mtgs w/applicants' staff; Working group mtg re: discovery request, next	1.00	550.00	SCB
steps Factual Investigation; Review DTC participant list, materials re: beneficial ownership of CDO	0.50	275.00	SCB
Notes Internal office mtgs w/applicants' staff; O/c w/WAM re: next steps re: service, prep of	1.60	880.00	RRR
discovery, staffing re: matter Telephone calls; T/c w/S. Collings re: service, issues related to prep of discovery, potential additional actions to file by Oct. 3 or 5, next	0.40	220.00	RRR
steps Internal office mtgs w/applicants' staff; O/c w/full team re: same, related issues,	1.30	715.00	RRR
assignments, next steps Internal office mtgs w/applicants' staff; Conf. with JDG re: retention issues and updated	0.20	110.00	JNL
disclosure list Preparation of pleading & briefs; Review and revise PRD affidavit re: retention as special	0.50	275.00	JNL
counsel Correspondence/memoranda drafted; Multiple emails re: retention affidavit and disclosures	0.70	385.00	JNL
Correspondence reviewed; Review and respond to emails from RRR re: October 3	0.50	275.00	JNL
deadline Internal office mtgs - 3rd party conf; Team mtg re: next steps	0.80	440.00	VTC

O/c and conf call w/WMD team re: next steps O/c's w/RRR, AMB, CGP re: discovery	1.20 0.50	594.00	MCL
O/c's w/RRR, AMB, CGP re: discovery	0.50		
	0.30	247.50	MCL
T/c w/J. Giampolo, Weil re: retention	1.00	495.00	MCL
application			.,,02
Legal research; Review Hague Convention	1.10	434.50	AMB
statutes			
Correspondence reviewed; Review email re:	0.10	39.50	AMB
CIBC Shareholder class action			
Correspondence reviewed; Review email from	0.10	39.50	AMB
RRR to S. Singh re: distribution list J. Peck's			
hearing agendas	0.20	70.00	() m
Review & analyze docs, pleadings, transcripts; Review retention affidavit	0.20	79.00	AMB
Correspondence reviewed; Review emails	0.20	70.00	AXCD
from J. Giampolo, JNL, PRD, WAM re:	0.20	79.00	AMB
retention affidavit			
Correspondence reviewed; Review email from	0.10	39.50	AMB
J. Costango re: possible expert			1 11 11 11
Correspondence reviewed; Review email from	0.10	39.50	AMB
RRR re: form affidavit of service			
Correspondence reviewed; Review revised	0.10	39.50	AMB
summons for Curtis Mallet's avoidance actions			
Internal office mtgs w/applicants' staff; O/c	0.30	118.50	AMB
w/MCL and CGP re: further research on			
Hague Convention			
Internal office mtgs w/applicants' staff; o/c	1.30	513.50	AMB
w/WAM, VTC, RRR, SCB, JNL, MCL re:			
discovery and next steps Correspondence/memoranda drafted; O/c	0.30	75.00	CGP
w/AMB and MCL re: research on service of	0.50	73.00	CGF
process on foreign defendants and taking of			
evidence (i.e. discovery) on the same			
Legal research; Research same, focusing on	0.90	225.00	CGP
treatise on international commercial law and			
the Hague Convention			
Telephone calls; Conference call with Weil re	0.50	175.00	JDG
(i) next steps re service of SPV complaint, (ii)			
preparation of our expedited discovery			
requests, and (iii) what			
amendments/"deferred" deals re LBSF filing Telephone calls; Telephone conversation with	0.10	35.00	IDC
Candace Arthur at Weil re preparing our	0.10	33.00	JDG
retention application as special litigation			
counsel			
Correspondence/memoranda drafted; Email to	0.20	70.00	JDG
Candace Arthur at Weil re our retention			-
affidavit for application as special litigation			
counsel			
Attn to contact lists of defendants per RRR	0.20	50.00	AHC
request			

	Correspondence reviewed; Print docs	0.10	11.00	MEB
	Correspondence/memoranda drafted: T/cs w/AHC re: status of updating attorney info on case docket and t/c w/B. Bush of SDNY Bankruptcy ECF Dept re: same; update and send letter to ECF with requested changes and email to AHC re: same	0.40	48.00	KLS
Sep-20-10	Review numerous emails re: status and next steps, and respond to same	0.30	178.50	WAM
	Organize files; Continue review, organization of numerous emails	0.80	440.00	RRR
	Correspondence/memoranda drafted; Draft, send email to team summarizing my 9/17 call w/S. Collings re: service, discovery, next steps re: additional filings	0.70	385.00	RRR
	Internal office mtgs w/applicants' staff; Mtg w/team re: overview of dispute and operation of early termination damages provision, next steps	0.70	385.00	RRR
	Internal office mtgs w/applicants' staff; O/c w/RRR re: prep of Hague country list	0.10	39.50	AMB
	Correspondence reviewed; Email to RRR re: Epiq's Affidavit of Service for Motion Expiditing Discovery	0.10	39.50	AMB
	Review & analyze docs, pleadings, transcripts; Review Epiq's affidavit of service for Motion Expediting Discovery	0.20	79.00	AMB
	Correspondence/memoranda drafted; Email to/from JNL re: retaining consultant for Hague Service	0.10	39.50	AMB
	Correspondence reviewed; Review email from RRR re: t/c w/S. Collings	0.10	39.50	AMB
	Review & analyze docs, pleadings, transcripts; Review CGP's memo re: Hague Convention service of process	0.50	197.50	AMB
	Internal office mtgs w/applicants' staff; O/c w/CGP re: Hague convention service of process	0.20	79.00	AMB
	Correspondence/memoranda drafted; Prep of list of countries	0.90	355.50	AMB
	Internal office mtgs - 3rd party conf: O/cs w/AMB and MCL re: research on service of process on foreign defendants	0.30	75.00	CGP
	Correspondence/memoranda drafted; Draft memo outlining procedure for serving process	2.40	600.00	CGP
	under the Hague Legal research; Research multiple sources re: procedure for serving process under the Hague Convention on the Service Abroad of Judicial	5.40	1,350.00	CGP

Sep-21-10

and Extrajudicial Docs in Civil or Commercial Matters for each defendant whose country of location is a Contracting Party to such			
convention Review & analyze docs, pleadings, transcripts; Review and analysis of preliminary overview background email regarding Goldman Sachs	0.40	140.00	JDG
Dispute - received from Debtors Telephone calls; Conference call with Weil re Goldman Sachs Dispute	0.50	175.00	ЉG
Correspondence reviewed: Review emails from RRR and update WGL accordingly per RRR's request	0.20	24.00	KLS
O/c w/RRR re: status, recent developments and next steps	0.40	238.00	WAM
Internal office mtgs w/applicants' staff; O/c w/WAM re: matter status, issues to address,	0.30	165.00	RRR
next steps Review & analyze docs, pleadings, transcripts; Review/circulate Summons issued by clerk	0.20	110.00	RRR
and Affidavit of Service proposed by Epiq Review & analyze docs, pleadings, transcripts; Review Notice of Agenda	0.10	39.50	AMB
Internal office mtgs w/applicants' staff; O/c w/MCL re: meeting to discuss discovery	0.10	39.50	AMB
Legal research; Conduct legal research re: obtaining names of noteholders	1.00	395.00	AMB
Review & analyze docs, pleadings, transcripts; Review OCP	0.30	118.50	AMB
Preparation of pleading & briefs; Coordination of filing Affidavit of Service	0.10	39.50	AMB
Internal office mtgs w/applicants' staff; O/c w/KLS re: assignment - copy cases cited in WGM slides	0.10	39.50	AMB
Internal office mtgs - 3rd party conf; O/c w/RRR re: reviewing docket for court's	0.10	25.00	CGP
agenda for 9/22 omnibus hearing day Correspondence/memoranda drafted; Draft correspondence to litigation team attaching	0.10	25.00	CGP
agenda Legal research; Review court docket for agenda, download and review same	0.20	50.00	CGP
Correspondence/memoranda drafted; Revise memo outlining procedure for service of process under the Hague Convention to include particular information on Central	0.60	150.00	CGP
Authorities in particular countries Legal research; Research declarations of particular countries who are parties to the Hague and identify such declarations which	2.20	550.00	CGP

, , , , , , , , , , , , , , , , , , ,			
limit the use of particular channels for service			
of process			
Review & analyze docs, pleadings, transcripts;	4.30	1,505.00	JDG
Review and analysis of all cases cited with			
respect to bankruptcy law points in the			
presentation and reference materials received			
from Debtors regarding the Goldman Sachs			
Dispute	0.40	1.40.00	TD C
Review & analyze docs, pleadings, transcripts;	0.40	140.00	ЉG
Review and analysis of Big Banks Cold Water Meetings emails and materials regarding			
mid-market value from Debtors			
Preparation of pleading & briefs; Outline of	0.70	245.00	JDG
Argument for Bank of America/Merrill Lynch	0.70	243.00	JDG
Meeting received from Debtors and			
accompanying emails			
Review & analyze docs, pleadings, transcripts;	1.10	385.00	JDG
Powerpoint Presentation regarding Argument			
for Bank of America/Merrill Lynch Meeting			
received from Debtors			
Review & analyze docs, pleadings, transcripts;	0.30	105.00	JDG
Notice of Agenda for 9-22-2010 10am			
hearings	0.40	4.40.00	
Preparation of pleading & briefs; A proof of	0.40	140.00	JDG
claim submitted by Goldman Sachs in Lehman			
Bankruptcy Legal research; Search and print cases from	0.60	66.00	ADR
Lexis for AMB	0.00	00.00	ADK
Litigation: O/c w/SCB re: assignments; copy	1.10	132.00	KLS
ISDA docs, distribute same to RRR, MCL and	1.10	132.00	KLS
AMB and return originals to SCB; o/c w/AMB			
re: pulling cases cited in Lehman background			
presentation materials and o/c w/ADR re:			
assistance w/same; pull and copy case from			
Westlaw and distribute same to ADR; save			
Affidavit of Service of Motion for Expedited			
Discovery on the system; e-file same and save			•
confirmation of same on the system; email			
same to AMB			
Review email re: status and next steps	0.10	59.50	WAM
Correspondence reviewed; Review email	0.50	275.00	JNL
string from RRR re: service of complaint in			
ipso facto action			
Correspondence/memoranda drafted; Emails to	1.00	550.00	JNL
from RRR and SB re: impact of interloc.			
appeal of BNY decision; review appeal order	0.10	20.50	43.00
Correspondence reviewed; Review emails from S. Singh re: address list	0.10	39.50	AMB
Correspondence reviewed; Review email re:	0.10	20.50	A LOD
BNY decision	0.10	39.50	AMB
Divi decision			

Sep-22-10

invoice w.	oumpio (zugoo zz			
	Correspondence/memoranda drafted; Revise service abroad outline to include relevant	1.00	250.00	CGP
	information from this research Legal research; Research service of process in Taiwan and Austria, including impact of Fed.	3.10	775.00	CGP
	R. Civ. P. Rule 4 Review & analyze docs, pleadings, transcripts; ABI Summary of District Court Decision Granting BNY Permission to Appeal Lehman Ruling	0.50	175.00	JDG
	Correspondence reviewed; Review email from Weil re contact information for all parties named in the avoidance actions commenced last week for purposes of service of the Motion to Stay	0.10	35.00	JDG
	Correspondence/memoranda drafted; Compare Lehman and WMD service lists	1.20	132.00	KJD
Sep-23-10	O/cs w/RRR re: status and issues	0.20	119.00	WAM
-	Review recent emails re: seeking additional materials	0.10	59.50	WAM
	Emails w/clients and RRR re: status conf tomorrow	0.20	119.00	WAM
	Correspondence/memoranda drafted; Draft/send email to clients inquiry re: potential new SPV avoidance actions to be filed	0.20	110.00	RRR
	Correspondence/memoranda drafted; Email memo of my analysis of all bankruptcy court cases cited in Lehman Bros.' power point presentation	0.80	280.00	JDG
	Organize files: Save MCL email and attachments re: proofs of claim on the system	0.10	12.00	KLS
Sep-24-10	O/cs w/AMB re: Weil et al group call today on status issues and o/c w/RRR re: recent developments and next steps	0.40	238.00	WAM
	Telephone calls; Conf call re: filing of additional cases	1.00	550.00	SCB
	Review repack docs	1.00	550.00	SCB
	Internal office mtgs w/applicants' staff; O/c w/AMB re: issues for SPV filings coming out of broader status call he covered	0.20	110.00	RRR
	Telephone calls: Long t/c w/Lehman Brothers re: status of filing complaints	2.90	1,145.50	AMB
	Review & analyze docs, pleadings, transcripts; Review Judge Peck's Order re: discovery	0.20	79.00	AMB
	Correspondence/memo drafted; Emails to/from A. Scarpa and RRR re: Ruby deals	0.10	39.50	AMB
	Correspondence/memo drafted; Emails to/from S. Collings re: new deals	0.10	39.50	AMB

•	,			
	Internal office mtgs w/applicants' staff; O/c w/RRR re: status of filing complaint	0.10	39.50	AMB
	Organize files: Save copy of Rule 2004 Order on the system per MCL's request	0.10	12.00	KLS
	Litigation: Check case docket online and t/c w/ECF office of SDNY Bankruptcy Court to make another request to have JNL added as counsel for Lehman Brothers and check docket again to make sure same has been updated	0.30	36.00	KLS
	Litigation: Download files from CD received from Weil today and save same on the system; t/cs w/AMB re: same; print out, organize and label lengthy Repack docs and distribute same to SCB	2.60	312.00	KLS
	Litigation: Review emails from AMB and print out docs for four additional deals, organize same into binders and distribute to SCB for review; t/c w/RRR re: Ruby 2006-7 deals docs, search flash drive for same and email docs re: same to A. Scarpa per RRR's request	2.10	252.00	KLS
Sep-27-10	T/c from St. Lawrence of Cleary re: noteholder	0.10	59.50	WAM
	Review & analyze docs, pleadings, transcripts; Review binders for additional deals to be added to complaint, update summary and prep	3.50	1,925.00	SCB
	email summarizing key REPACK provisions Internal office mtgs w/applicants' staff; Review/respond to AMB and SCB emails re: analysis of new SPV distributed deals to add to Amended Complaint and issues raised by same	0.30	165.00	RRR
	Avoidance Action Litigation; Review emails re: amendments to complaint	1.20	660.00	JNL
	Rev'd internal email correspondence re: new SPV deals for Amended Complaint	0.80	396.00	MCL
	Correspondence/memo drafted; Prep of email to Team re: Friday call w/Lehman and WGM	2.00	790.00	AMB
	Correspondence/memo drafted; emails to/from RRR re: summary of Friday's call w/Lehman and WGM	0.10	39.50	AMB
	Correspondence/memo drafted; emails to/from SCB re: differences in the Repack deal as	0.10	39.50	AMB
	compared to other deals Correspondence/memo drafted; email to/from N. Zelitzki re: missing docs from various deals	0.10	39.50	AMB
	Correspondence/memo drafted; prep of email to VTC re: research question re: amending	0.50	197.50	AMB
	class action lawsuit Telephone calls; T/cs w/S. Collings re: amending complaint	0.50	197.50	AMB

Internal office mtgs w/applicants' staff; Numerous o/cs w/SCB re: amending complaint	0.70	276.50	AMB
Legal research; conduct legal research re: amending Complaint to add additional Plaintiff	0.90	355.50	AMB
Review & analyze docs, pleadings, transcripts; Review and analysis of Complaint against U.S. Bank National Association, Madison Avenue Structured Finance CDO I, Ltd., et al., Filed on behalf of Lehman Brothers Financial Products Inc.	0.50	175.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of Complaint against The Bank of New York Mellon Trust Co., National Association, Liberty Square CDO I, Corp., Liberty Square CDO I, Ltd., et al., Filed on behalf of Lehman Brothers Financial Products Inc.	0.40	140.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of Complaint against The Bank of New York Mellon Corporation, BNY Corporate Trustee Services Limited, Beryl Finance Ltd. As Issuer of Series 2005-2, Beryl Finance Ltd. As Issuer of Series 2005-7., et al., Filed on behalf of Lehman Brothers Special Financing	0.50	175.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of Complaint against The Bank of New York Mellon Trust Co., National Association, TIAA Structured Finance CDO I, Ltd., , et al., Filed on behalf of Lehman Brothers Financial products	0.40	140.00	ЉG
Internal office mtgs w/applicants' staff; review correspondence re: case status and filing later in the week and o/cs w/MCL, AMB re: same	0.20	50.00	AHC
Correspondence/memoranda drafted; Proof and edit emails	0.20	22.00	MEB
Litigation: Review email from AMB and print out same and termination letters for new deals we received on 9/24; organize and distribute same to SCB and save same on the system	0.30	36.00	KLS
Review & analyze docs, pleadings, transcripts; Review and summarize additional REPACK 2003-1 docs	2.50	1,375.00	SCB
Internal office mtgs w/applicants' staff; O/cs w/AMB, MCL, VTC re: class action pleading issues raised by including RePack deal in Amended Complaint	0.20	110.00	RRR

Sep-28-10

Sample	(I dit I of Z)Pageg 31	, 4 01 02		
Review & analyz Follow up on rete	te docs, pleadings, transcripts;	0.40	220.00	JNL
Legal research; R	Research issues relating to o/cs and emails re: same	2.00	1,100.00	VTC
	Research issues relating to	3.50	1,925.00	VTC
Rev'd internal co Complaint; issue	orrespondence re: Amended s re: Repack deal	1.50	742.50	MCL
O/c w/AMB re;	class action issues raised by aint/Repack complaint	0.30	148.50	MCL
Revised email me	emo re: class action issues ed Complaint/Repack	0.40	198.00	MCL
Correspondence/	memo drafted; email to/from amending avoidance action	0.10	39.50	AMB
Preparation of ple Amended compla	eading & briefs; prep of aint	5.30	2,093.50	AMB
	reviewed; review email from re: Goldman SAI inquiry re:	0.10	39.50	AMB
Correspondence	reviewed; review email from . Collings re: additional deal	0.10	39.50	AMB
Review & analyz	te docs, pleadings, transcripts; m SCB re: review of	0.10	39.50	AMB
	te docs, pleadings, transcripts;	0.10	39.50	AMB
_	memoranda drafted; email le re: address of Bank of	0.10	39.50	AMB
Review & analyz	te docs, pleadings, transcripts; search re: amending	0.10	39.50	AMB
	memoranda drafted; Proof	0.10	11.00	MEB
Review recent en filings required a	nails re: assignments, new	0.20	119.00	WAM
	new assignment and filings	0.20	119.00	WAM
Review & analyz	te docs, pleadings, transcripts; der 550 f wrt new complaint	2.30	1,414.50	PRD
Preparation of ple	eading & briefs; Respond to in connection w/prep of	1.00	550.00	SCB
Telephone calls;	Conf call w/JNL, AMB re: S. on re: RePack claims under	0.30	165.00	RRR

Sep-29-10

Legal research; Research 550 statute of limitations and subsequent transferee issues	4.80	2,640.00	JNL
Correspondence/memoranda drafted; Multiple emails from to RRR, PRD and AB re: 550	1.00	550.00	JNL
limitations Review & analyze docs, pleadings, transcripts; Review and comment on final retention papers	0.80	440.00	JNL
Legal research research class certification issues and o/cs w/AB and MCL re: same	1.50	825.00	VTC
Rev'd internal email correspondence re: class action issues (.5)	0.30	148.50	MCL
Rev'd internal correspondence re: Fabrikant case, Section 550 avoidance actions	0.40	198.00	MCL
Preparation of pleading & briefs; prep of Amended Complaint	2.00	790.00	AMB
Correspondence/memo drafted; emails to/from JNL, RRR, PRD re: prep of Complaint re: RePack	0.20	79.00	AMB
Correspondence/memo drafted; emails to/from AHC and S. Collings re: filing RePack Complaint	0.10	39.50	AMB
Preparation of pleading & briefs; prep of Complaint against RePack	6.40	2,528.00	AMB
Internal office mtgs w/applicants' staff; o/c w/RRR re: assignments drafting RePack Complaint	0.30	118.50	AMB
Legal research on logistics for filing, bankruptcy rules, information for amended complaint	3.00	750.00	АНС
Preparation of pleading & briefs; review Amended Complaint	1.00	250.00	AHC
Review, respond and forward emails re: new filing required for Quartz transaction	0.30	178.50	WAM
Review emails re: additional and new filings related to SPV litigation	0.30	178.50	WAM
O/cs w/RRR re: additional and new filings related to SPV litigation	0.30	178.50	WAM
Review & analyze docs, pleadings, transcripts; Review Quartz 2004-1 docs	1.00	550.00	SCB
Legal research; Review/analyze Fabrikant case circulated by PRD re: Section 550(f) claims	0.50	275.00	RRR
Internal office mtgs w/applicants' staff; O/c w/AMB re: implications of Fabrikant case on our use of Section 550(f)	0.20	110.00	RRR
Correspondence/memoranda drafted; Draft/circulate email to team re: implications of Fabrikant case and follow up emails re: same	0.10	55.00	RRR

Sep-30-10

Internal office mtgs w/applicants' staff; O/cs w/AMB re: issues related Amended Complaint	0.50	275.00	RRR
re: distributed SPVs Correspondence/memoranda drafted; Draft/send email to L. McMurry w/draft Amended Complaint for distributed SPV	0.20	110.00	RRR
actions and re: plans re: RePack deal Preparation of pleading & briefs; Review draft of Amended Complaint re: distributed SPV deals and t/cs w/AMB re: finalizing same for filing	0.50	275.00	RRR
Legal research; Continue research on 550 issues	2.80	1,540.00	JNL
Correspondence/memoranda drafted; Review and respond to emails from RRR and AB re: RePack matter	0.50	275.00	JNL
Correspondence/memoranda drafted; Emails from/to J. Giampolo re: finalizing retention pleadings	0.40	220.00	JNL
Review & analyze docs, pleadings, transcripts; Review amended complaint in flip action	1.00	550.00	JNL
Correspondence reviewed; Review emails from RRR, S Collins and L. McMurray re: RePack decision	0.50	275.00	JNL
Legal research: Research and prep memo on class certification	5.00	2,750.00	VTC
Rev'd internal email correspondence re: Amended Complaint	0.40	198.00	MCL
Preparation of pleading & briefs Prep of RePack Complaint	6.00	2,370.00	AMB
Telephone calls T/cs w/S. Collings re: viability of Repack claim	0.20	79.00	AMB
Review & analyze docs, pleadings, transcripts Review VTC's memo on class action	0.30	118.50	AMB
Correspondence reviewed review email from RRR to S. Collings re: Soc Gen	0.10	39.50	AMB
Correspondence reviewed review emails from PRD, RRR and VTC re: possible claims against RePack	0.20	79.00	AMB
Telephone calls T/c w/JNL re: 550(f) and possible claims against RePack	0.10	39.50	AMB
Correspondence reviewed review emails from S. Collings re: Quartz deal	0.10	39.50	AMB
Correspondence/memo drafted prep of draft email to Locke re: draft amended compl and solvency of LDBP	0.10	39.50	AMB
Preparation of pleading & briefs Revise amended class action complaint	2.00	790.00	AMB
Review & analyze docs, pleadings, transcripts Review deal docs for Quartz deal	0.30	118.50	AMB

Review & analyze docs, pleadings, transcripts; Review of Notice of Presentment of Application of the Debtors for Authorization to Employ and Retain Wollmuth Maher & Deutsch LLP as Special Counsel to the Debtors	0.20	70.00	JDG
Preparation of pleading & briefs; Final revisions/changes to Retention Affidavit and to Retention Application for Wollmuth Maher	0.60	210.00	JDG
Correspondence/memoranda drafted; Email to Debtors' lead counsel re final revisions/changes to Retention Affidavit and to Retention Application for Wollmuth Maher	0.10	35.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of Complaint against Bank of New York Mellon National Association for Declaratory judgment and Recovery of preference Filed by Lehman Brothers Special Financing Inc.	0.50	175.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of Complaint against Bank Of New York, BNY Corporate Trustee Services Limited, Gazprombank Mortgage Funding 2 S.A., Ruby Finance Public Limited Company, as Issuer of the Series 2006-7 Filed on behalf of Lehman Brothers Special Financing Inc.	0.60	210.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of Declaration of Holly E. Loiseau in Support of Motion of Lehman Brothers Special Financing Inc. Pursuant to Section 362 for Enforcement of the Automatic Stay and for Sanctions for Violation of the ADR Procedures Order	0.50	175.00	ЉG
Review & analyze docs, pleadings, transcripts; Review and analysis of Complaint against Wells Fargo Bank National Association, Deutsche Bank Trust Company Americas, U.S. Bank National Association, IMPAC CMB TRUST SERIES 2005-03, et al., Filed on behalf of Lehman Brothers Special Financing Inc.	0.60	210.00	JDG
Review & analyze docs, pleadings, transcripts; Review and analysis of Motion of Lehman Brothers Special Financing Inc. Pursuant to Section 362 of the Bankruptcy Code for Enforcement of the Automatic Stay and for Sanctions for Violation if the ADR Procedures Order	0.50	175.00	ЉG

(, , , , , , , , , , , , , , , , , , ,			
Review & analyze docs, pleadings, transcripts; Review and analysis of Complaint against PT Mobile-8 Telecom Tbk, Filed on behalf of	0.40	140.00	JDG
Lehman Brothers Special Financing Inc. Review & analyze docs, pleadings, transcripts; Review of Notice of Sixty-Second Supplemental List of Ordinary Course	0.40	140.00	JDG
Professionals filed on behalf of Lehman			•
Brothers Holdings Inc.		. =	
Review & analyze docs, pleadings, transcripts;	0.50	175.00	JDG
Review and analysis of Motion of the Debtors for Authorization and Approval of a			
Settlement and Compromise Among Lehman			
Brothers Holdings Inc., Lehman Commercial			
Paper Inc. and Danske Bank A/S London			
Branch			
Review & analyze docs, pleadings, transcripts;	0.40	140.00	JDG
Review and analysis of Debtors' Forty-Ninth			
Omnibus Objection to Claims (Duplicative of Indenture Trustee Claims)			
Review & analyze docs, pleadings, transcripts;	0.50	175.00	JDG
Review of Debtors' Motion for Approval of (I)			
A Se			
Correspondence/memoranda drafted; Proof and edit email	0.10	11.00	MEB
Litigation: Review emails from AMB re:	1.00	120.00	KLS
Quartz 2004-1 deal docs, print out, organize			
and distribute binder of same to SCB for			
review; save same on the system under background docs			
Correspondence reviewed: Review emails re:	0.20	119.00	WAM
potential new filings			
Review & analyze docs, pleadings, transcripts;	1.00	550.00	SCB
Review additional Quartz 2004-1 docs			
Preparation of pleading & briefs; Review draft	0.50	275.00	SCB
complaint Internal office mtgs w/applicants' staff; O/cs	0.30	165.00	RRR
w/MCL re: finalizing amended complaint and	0.50	105.00	NIX
new summons, filing logistics			
Correspondence/memoranda drafted; Emails	0.10	55.00	RRR
w/Weil, client re: remaining Quartz deal docs			
needed; emails w/SCB re: his analysis of same Correspondence reviewed; Review emails re:	0.80	440.00	JNL
comments to retention	0.00	440.00	JITL
Preparation of pleading & briefs; Finalize	0.50	275.00	JNL
Lehman retention affidavit			
Review & analyze docs, pleadings, transcripts;	1.00	550.00	JNL
Review amended complaints			
Finalize Amended Complaint for filing;	2.00	990.00	MCL
revised Amended Summons			

Oct-01-10

O/cs w/RRR, AC re: finalizing Amended Complaint, Amended Summons	1.10	544.50	MCL
T/c w/C. Stauble re: Amended Complaint, Amended Summons	0.50	247.50	MCL
Email correspondence and o/cs w/RRR, AC re:	0.70	346.50	MCL
Amended Complaint and Summons; email exchanges w/C. Stauble, Epiq re: same Correspondence reviewed; Emails to/from A. Lee, S. Collings, RRR re: additional docs for	0.10	39.50	AMB
Amended Complaint Correspondence reviewed; Review emails from RRR and S. Collings re: additional complaints filed by LB	0.10	39.50	AMB
Correspondence reviewed; Review email from MCL to EPIQ re: service of Amended Complaint	0.10	39.50	AMB
Telephone calls; T/c w/Nili re: Amended Complaint	0.10	39.50	AMB
Correspondence reviewed; Review email between RRR, L. McMurray and S. Collings re: not filing RePack deal Complaint	0.10	39.50	AMB
Correspondence reviewed; Review email from S. Singh and RRR re: filing and serving	0.10	39.50	AMB
Amended Complaint Correspondence reviewed; Review email from SCB re: analysis and conclusions re: additional	0.10	39.50	AMB
deal docs for Amended Complaint Review & analyze docs, pleadings, transcripts; SPV avoidance actions re: review and analysis	0.50	175.00	JDG
of emails to and from lead counsel re the LBDP and LBFP solvency issue Preparation of pleading & briefs; Prepared final changes to affidavit in support of	0.60	210.00	JDG
retention order for retention of WMD Correspondence/memoranda drafted; Emails to and from lead counsel re final changes to	0.30	105.00	JDG
affidavit in support of retention order for retention of WMD Review & analyze docs, pleadings, transcripts; Review and analysis of latest draft of the	0.50	175.00	ЉG
amended complaint in the SPV avoidance action Preparation of pleading & briefs; Prepared	1.40	490.00	JDG
final changes/additions to application for retention of WMD			
Preparation of pleading & briefs; edits to schedules and complaint; o/cs w/MCL re: same; file same	2.70	675.00	AHC
Correspondence reviewed: Review emails re: amended complaint	0.10	59.50	WAM

Oct-02-10

mvoice #.	Sample (Part 1 01 2) Pa	gay 37401 02		
Oct-04-10	Correspondence reviewed: Review emai	ls re: 0.10	59.50	WAM
	Telephone calls; T/c w/counsel for BNY Mellon re: BNY entities named in Compand t/c w/AMB re: next steps re: same		110.00	RRR
	Telephone calls; T/cs and emails w/Epiq service of docs	re: 0.60	237.00	AMB
	Correspondence reviewed; Review emai amended summons	ls re: 0.10	39.50	AMB
	Correspondence reviewed; Review emai from C. Stauble and MCL re: providing	ls 0.10	39.50	AMB
	additional information for Stay Motion Correspondence/memoranda drafted; En to/from RRR, MCL and AHC re: creating of corrected defendants		39.50	AMB
	Correspondence/memoranda drafted; Promemo re: BNY Mellon	ep of 0.50	197.50	AMB
	Correspondence/memoranda drafted; Pro email to MCL and CGP re: next steps fo discovery	-	39.50	AMB
	Correspondence/memoranda drafted; En to/from RRR re: service of doc to Sidley Austin		39.50	AMB
	Correspondence/memoranda drafted; En to/from RRR re: service of docs to Sidle Austin		39.50	AMB
	Legal research; Research re: methods of "taking evidence" abroad, specifically the Hague Convention re: same		125.00	CGP
	Internal office mtgs - 3rd party conf; O/c w/AMB re: broader mtg w/team re: servi and discovery		25.00	CGP
	Correspondence reviewed; o/cs w/AMB same	re: 0.20	50.00	AHC
Oct-05-10	Fee application preparation; Review billiprocedures in preparation of first monthly	y fee	220.00	JNL
	application pending approval of retention Correspondence/memoranda drafted; Pre- memo re: BNY Mellon		276.50	AMB
	Telephone calls; T/c w/I. deVyver re: BN Mellon	NY 0.20	79.00	AMB
	Correspondence/memoranda drafted; Resupplemental affidavit of service from Elemotion for Expedited Discovery, email to RRR reseame	piq re:	79.00	AMB
	Review & analyze docs, pleadings, transc Review Revised Proposed Order Staying Avoidance Actions	* '	39.50	AMB
	Internal office mtgs w/applicants' staff; C w/RRR re: BNY Mellon memo	0.20	79.00	AMB

•	Review & analyze docs, pleadings, transcripts; Motion to Join filed by Paul R. DeFilippo on behalf of Lehman Brothers Special Financing	0.40	140.00	ЉG
	Inc. in SPV Litigation adversary proceeding Review & analyze docs, pleadings, transcripts; Amended Complaint on behalf of Lehman Brothers Special Financing Inc. in SPV	0.50	175.00	JDG
	Litigation adversary proceeding Review & analyze docs, pleadings, transcripts Statement: Schedules to First Amended Complaint filed on behalf of Lehman Brothers Special Financing Inc. in SPV Litigation	0.40	140.00	JDG
Oct-06-10	adversary proceeding Correspondence reviewed: Review email and t/c from Mayer Brown re: CIBC claim, emails w/WMD personnel re: same and respond to	0.30	178.50	WAM
	same Internal office mtgs w/applicants' staff; Mtg w/CGP, AMB and MCL re: noteholders	0.70	385.00	SCB
	discovery issues Review & analyze docs, pleadings, transcripts; Review transaction files re: availability of	0.50	275.00	SCB
	CUSIP and ISIN numbers Review & analyze docs, pleadings, transcripts; Review revised stayed avoidance action	0.40	220.00	JNL
	schedules Internal office mtgs - 3rd party conf; O/c w/AMB, SCB, CGP re: discovery	0.80	396.00	MCL
	Internal office mtgs - 3rd party conf; O/c w/AMB re: same	0.20	99.00	MCL
	Internal office mtgs w/applicants' staff; O/c w/MCL re: service of process and discovery	0.20	79.00	AMB
	plan Internal office mtgs w/applicants' staff; O/c w/RRR re: BNY Mellon	0.10	39.50	AMB
	Telephone calls; T/c w/attorney for BNY Mellon re: correct name of company	0.20	79.00	AMB
	Internal office mtgs w/applicants' staff; O/c w/SCB re: CUSIP numbers	0.20	79.00	AMB
	Internal office mtgs w/applicants' staff; O/c w/SCB, MCL and CGP re: service of process and discovery plan	0.80	316.00	AMB
	Legal research; Continue research taking of evidence abroad under the Hague Convention and/or authorities relevant to particular non-signatories; prep binder of information reservice and taking evidence abroad	3.20	800.00	CGP

w/SCB, AMB and MCL re: service and taking	0.80	200.00	CGP
Preparation of pleading & briefs; file supplemental certificate of service; o/cs	0.50	125.00	AHC
Preparation of pleading & briefs; Prep binders containing docs re: service of process abroad	2.00	220.00	MEB
Correspondence/memoranda drafted: Emails to/from Ziegler of Mayer Brown re: stay application re: CIBC and Pxyxis transaction,	0.20	119.00	WAM
Review of file; Review/refresh re: motion for stay of avoidance actions and motion for	0.30	165.00	RRR
Correspondence reviewed; Review emails from JDG and respond to same re: Creditors Committee and UST queries on retention;	1.40	770.00	JNL
Telephone calls; T/cs JDG and A.	0.50	275.00	JNL
Correspondence/memoranda drafted; Draft email to A. Velez-Rivera re retention issue	0.20	110.00	JNL
Correspondence reviewed; Review and respond to emails from R. Ziegler, WAM and	0.60	330.00	JNL
Review & analyze docs, pleadings, transcripts; Review stay motion in anticipation with call	0.30	165.00	JNL
Telephone calls; T/c w/Laura Davies of Southern Missouri Bancorp re: allegedly being	0.40	198.00	MCL
Internal office mtgs - 3rd party conf; O/c	0.30	148.50	MCL
Review & analyze docs, pleadings, transcripts; Rev'd Pyxis materials to prep for call w/Mayer	0.80	396.00	MCL
Correspondence/memoranda drafted; Prep of	1.60	632.00	AMB
Correspondence reviewed; Review email from MCL and AHC re: t/c w/counsel for Southern	0.10	39.50	AMB
Legal research; Researching for any local rules regarding our right or time constraints to file a reply to any opposition received on our	1.10	385.00	JDG
Correspondence/memoranda drafted; Emails to and from lead counsel re confirming that the concerns of the US trustee and the committee regarding WMD's retention were resolved	0.30	105.00	ЉG
	evidence abroad Preparation of pleading & briefs; file supplemental certificate of service; o/cs w/AMB re: same Preparation of pleading & briefs; Prep binders containing docs re: service of process abroad and taking of evidence abroad Correspondence/memoranda drafted: Emails to/from Ziegler of Mayer Brown re: stay application re: CIBC and Pxyxis transaction, and o/cs w/WMD attorneys re: same Review of file; Review/refresh re: motion for stay of avoidance actions and motion for expedited discovery Correspondence reviewed; Review emails from JDG and respond to same re: Creditors Committee and UST queries on retention; follow up emails with JDG, PRD re: same Telephone calls; T/cs JDG and A. Velez-Rivera re: retention issues Correspondence/memoranda drafted; Draft email to A. Velez-Rivera re retention issue Correspondence reviewed; Review and respond to emails from R. Ziegler, WAM and PRD re: CIBC-Pyxis counsel Review & analyze docs, pleadings, transcripts; Review stay motion in anticipation with call with CIBC counsel Telephone calls; T/c w/Laura Davies of Southern Missouri Bancorp re: allegedly being named in SPV complaint in error Internal office mtgs - 3rd party conf; O/c w/RRR re: 10/8 call w/Mayer Brown re: Pyxis Review & analyze docs, pleadings, transcripts; Review & ana	w/SCB, AMB and MCL re: service and taking evidence abroad Preparation of pleading & briefs; file supplemental certificate of service; o/cs w/AMB re: same Preparation of pleading & briefs; Prep binders containing does re: service of process abroad and taking of evidence abroad Correspondence/memoranda drafted: Emails to/from Ziegler of Mayer Brown re: stay application re: CIBC and Pxyxis transaction, and o/cs w/WMD attorneys re: same Review of file; Review/refresh re: motion for stay of avoidance actions and motion for expedited discovery Correspondence reviewed; Review emails from JDG and respond to same re: Creditors Committee and UST queries on retention; follow up emails with JDG, PRD re: same Telephone calls; T/cs JDG and A. Velez-Rivera re: retention issues Correspondence/memoranda drafted; Draft email to A. Velez-Rivera re retention issue Correspondence reviewed; Review and respond to emails from R. Ziegler, WAM and PRD re: CIBC-Pyxis counsel Review & analyze docs, pleadings, transcripts; Review & analyze docs, pleadings, transcripts; Review stay motion in anticipation with call with CIBC counsel Telephone calls; T/c w/Laura Davies of Southern Missouri Bancorp re: allegedly being named in SPV complaint in error Internal office mtgs - 3rd party conf; O/c w/RRR re: 10/8 call w/Mayer Brown re: Pyxis Review & analyze docs, pleadings, transcripts; Review & analyze	w/SCB, AMB and MCL re: service and taking evidence abroad Preparation of pleading & briefs; file supplemental certificate of service; o/cs w/AMB re: same Preparation of pleading & briefs; Prep binders containing does re: service of process abroad and taking of evidence abroad Correspondence/memoranda drafted: Emails to/from Ziegler of Mayer Brown re: stay application re: CIBC and Pxyxis transaction, and o/cs w/WMD attorneys re: same Review of file; Review/refresh re: motion for stay of avoidance actions and motion for expedited discovery Correspondence reviewed; Review emails from JDG and respond to same re: Creditors Committee and UST queries on retention; follow up emails with JDG, PRD re: same Telephone calls; T/cs JDG and A. Velez-Rivera re: retention issues Correspondence/memoranda drafted; Draft email to A. Velez-Rivera re retention issue Correspondence reviewed; Review and respond to emails from R. Ziegler, WAM and PRD re: CIBC-Pyxis counsel Review & analyze docs, pleadings, transcripts; Review stay motion in anticipation with call with CIBC counsel Telephone calls; T/c w/Laura Davies of Southern Missouri Bancorp re: allegedly being named in SPV complaint in error Internal office mtgs - 3rd party conf; O/c w/RRR re: 10/8 call w/Mayer Brown re: Pyxis Review & analyze docs, pleadings, transcripts; Review and transcripts; Review & analyze docs, pleadings, transc

	Correspondence reviewed; review all corrective communications re: service of amended complaint and appropriate parties to	0.30	75.00	АНС
Oct-08-10	same; create list of same Review & analyze docs, pleadings, transcripts: Review background materials and filings to prepare for conf call w/Mayer Brown re: CIBC and Pyxis	0.40	238.00	WAM
	Telephone calls; Conf call w/Ziegler and Trust of Mayer Brown, and WMD personnel re: CIBC and Pyxis and CIBC comments re: stay issues	0.40	238.00	WAM
	Review & analyze docs, pleadings, transcripts: Review materials forwarded by Mayer Brown re: CIBC side letter	0.20	119.00	WAM
	Internal office mtgs w/applicants' staff: O/c w/RRR re: contacting Weil re: CIBC issues, and conf call w/Weil's office re: same	0.30	178.50	WAM
	Correspondence/memoranda drafted: Send email to Weil re: CIBC issues, and review email from Weil re: same	0.30	178.50	WAM
	Avoidance Action Litigation; Telcon w/counsel for CIBC re: motion to stay	0.50	307.50	PRD
	Review & analyze docs, pleadings, transcripts; Identify CUSIP and ISIN numbers for transactions and determine whether	3.00	1,650.00	SCB
	transactions are book-entry or certificated Internal office mtgs w/applicants' staff; O/c w/MCL re: conf call w/M. Brown re: Pyxis, next steps	0.20	110.00	RRR
	Telephone calls; T/c w/counsel for Credit Agricole re: scope of intended expedited discovery	0.20	110.00	RRR
	Review & analyze docs, pleadings, transcripts; Review notice of no objection from UST to WMD retention	0.10	55.00	JNL
	Correspondence reviewed; Review email from PRD, WAM and FRK re: WMD retention	0.20	110.00	JNL
	Correspondence/memoranda drafted; Emails to/from MDL re: UST srvice of documents	0.30	165.00	JNL
	Internal office mtgs - 3rd party conf; T/c w/WAM, PRD, R. Ziegler (Mayer Brown), B. Trust (Mayer Brown) re: stay and discovery motions	0.20	99.00	MCL
	Review & analyze docs, pleadings, transcripts; Review Libra settlement materials	0.50	247.50	MCL
	Correspondence reviewed; Draft email memo to team re: Libra settlement materials	0.30	148.50	MCL
	Internal office mtgs - 3rd party conf; O/c w/AMB re: discovery plan	0.30	148.50	MCL

(, -3			
Review & analyze docs, pleadings, transcripts; Review and comment on draft discovery plan	0.50	247.50	MCL
Correspondence reviewed; Email correspondence w/AMB re: discovery plan	0.30	148.50	MCL
Legal research; Review Enron v. TXU case re: termination value calculation	1.40	693.00	MCL
Correspondence/memoranda drafted Prep of memo re: discovery "to do" list	3.00	1,185.00	AMB
Internal office mtgs w/applicants' staff; O/c w/MCL re: "to do" list re: discovery	0.20	79.00	AMB
Correspondence reviewed; Review emails from WMD, PRD re: US Trustee filing no objection to WMD's retention	0.20	79.00	AMB
Telephone calls; Telephone calls to and from Debtors' lead counsel re issues and inquiries expressed by the US Trustee and by the Creditors' committee	0.40	140.00	ЛDG
Correspondence/memoranda drafted; Emails to and from Debtors' lead counsel re issues and inquiries expressed by the US Trustee and by the Creditors' committee	0.40	140.00	JDG
Review & analyze docs, pleadings, transcripts; US Trustee's Statement of No Objection to WMD's retention by the Lehman Estate	0.30	105.00	JDG
Legal research re: various discovery issues; o/cs and emails w/MCL, AMB re: same	3.00	750.00	AHC
Organize files: Velobind copy of 1st Amended Complaint and distribute same to RRR per his request	0.10	12.00	KLS
Correspondence/memoranda drafted: Emails to/from Weil and t/c w/Weil re: motion for	0.30	178.50	WAM
Telephone calls: Conf. call w/L. McMurray, PRD and RRR re: motion for stay, issues re:	0.40	238.00	WAM
same, discovery and related matters Correspondence/memoranda drafted: Email to CIBC's counsel re: motion for stay	0.10	59.50	WAM
Review & analyze docs, pleadings, transcripts; Review memo on expedited discovery and meet w team re same	2.50	1,537.50	PRD
Review & analyze docs, pleadings, transcripts; Locate CUSIP/ISIN numbers	1.00	550.00	SCB
Internal office mtgs w/applicants' staff; Mtg w/AHC re: CUSIP numbers, mtg w/working	1.50	825.00	SCB
group re: discovery issues Telephone calls; T/c w/S. Singh, WAM re: issues raised by CIBC w/r/t motion for stay of	0.10	55.00	RRR
avoidance actions Internal office mtgs w/applicants' staff; Meet w/team to map out discovery needs, discovery	1.30	715.00	RRR

Oct-11-10

methods/sequence, next steps; follow up o/c w/AMB re: same			
Telephone calls; Conf call w/L. McMurray, WAM, PRD re: discussions w/Mayer Brown re: motion for stay and re: next steps related to	0.30	165.00	RRR
motion for expedited discovery Correspondence/memoranda drafted; Multiple emails from WAM, B. Trust re: CIBC conf.	0.30	165.00	JNL
call Internal office mtgs - 3rd party conf; O/c w/RRR, SCB, AMB re: discovery plan and to	1.00	495.00	MCL
do list; o/c w/AMB re: same Internal office mtgs w/applicants' staff; Long o/c w/PRD, RRR, SCB, MCL re: next steps re: discovery	1.30	513.50	AMB
Correspondence reviewed; Review email from JG re: time to serve reply re: Motion for Expedited Discovery	0.10	39.50	AMB
Telephone calls; T/c w/JG re: time to serve reply re: Motion for Expedited Discovery	0.10	39.50	AMB
Review & analyze docs, pleadings, transcripts; Review VTC's research memo re: tolling re: class actions	0.30	118.50	AMB
Internal office mtgs w/applicants' staff; O/c w/RRR re: next steps	0.10	39.50	AMB
Legal research on reviewing deal documents for CUSIP numbers; o/cs w/SCB, AMB re:	6.50	1,625.00	AHC
same; create master list of same Prep of transactional & misc. docs; Enter data in Deal Documents table	1.20	132.00	MEB
Telephone calls: Conf call w/Ziegler and Trust, PRD, RRR and RCL re: CIBC issues re: stay motion, and o/c w/PRD, RRR and RCL	0.30	178.50	WAM
re: same Correspondence reviewed: Review email from Ziegler summarizing part of telephone call of today, and send email to Ziegler, Trust and WMD attorneys re: same, and communicate w/client re: same	0.40	238.00	WAM
Correspondence reviewed: Review emails re: communications with counsel for Deutsche Bank on motion for stay	0.10	59.50	WAM
Telephone calls: T/c from counsel for Rabobank re: issues on motion for expedited discovery; forward to RRR w/message, review emails from PRD and RRR re: same and follow-up	0.30	178.50	WAM
Telephone calls; Telcon client and CIBC re stay motion	0.60	369.00	PRD

Oct-12-10